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Attorneys for Plaintiff,  
OWEN DIAZ

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

OWEN DIAZ,  
Plaintiff,  
v.  
TESLA, INC. dba TESLA MOTORS, INC.;  
Defendant.

Case No. 3:17-cv-06748-WHO

**DECLARATION OF LAWRENCE A.  
ORGAN IN SUPPORT OF PLAINTIFF'S  
APPLICATION FOR REASONABLE  
ATTORNEYS' FEES AND EXPENSES**

Retrial Date: March 27, 2023  
Complaint filed: October 16, 2017  
Hearing: January 10, 2024

**DECLARATION OF LAWRENCE A. ORGAN**

I, Lawrence A. Organ, declare and state as follows:

1. I make this declaration of my own personal knowledge, except where stated upon information and belief, and if called as a witness, I would and could testify competently to the matters stated herein.

2. I am an attorney admitted to practice in the State of California and have been a member of the State Bar of California since 1994. I am admitted to practice in the U.S. District Court for the Northern District as well as the United States Supreme Court. I am currently a member in good standing with the Bar and I have never had any issues relating to discipline or otherwise with the State Bar.

**EXPERIENCE AND QUALIFICATIONS**

3. I am a civil rights attorney with offices in San Anselmo, San Francisco, Oakland, and Los Angeles, California. I am the sole proprietor of the Law Offices of Lawrence A. Organ doing business as the California Civil Rights Law Group. I have three partners and three associate attorneys in my firm. In addition, I co-counsel various cases with other plaintiffs' civil rights attorneys throughout California, including in Sonoma, Solano, Contra Costa, San Francisco, Alameda, Napa, Placer, Sacramento, Santa Clara, Santa Cruz, San Bernardino, San Louis Obispo, Los Angeles, Orange, Riverside, and San Diego counties.

4. I am a 1994 graduate of Duke University School of Law where I graduated with honors. While at Duke, I was Chair of the Moot Court Board and an Editor of Environmental Law and Policy Forum. Also at Duke as part of the legal clinics there, I worked for the Durham County District Attorney's Office as an associate prosecutor handling misdemeanor cases. I tried nine misdemeanor cases as the sole attorney for the District Attorney's Office and I worked on the trial team as second chair for two felony trials.

5. Before attending law school, I earned a Master's Degree in Politics from Monash University in Melbourne, Australia, which I attended on a Rotary Foundation Scholarship. In 1984, I graduated with high honors from the University of California, Berkeley with a Bachelor of Arts degree in Political Science, and was inducted into Phi Beta Kappa while at Berkeley.

1           6.       I am admitted to practice before the California Supreme Court , the United States  
2 Court of Appeals for the Ninth Circuit, and the federal Northern, Central and Eastern District  
3 Courts in California. I am also admitted to practice before the United States Supreme Court.

4           7.       After graduating from law school, I was selected by the U.S. Department of  
5 Transportation's Honor's Program which picked eight attorneys from top law schools around the  
6 country. I then worked for Rosen, Bien & Asaro which is a civil rights firm in San Francisco  
7 that specialized in plaintiff's civil rights appeals and attorney's fees motions. While I worked  
8 there, I was appellate counsel on *Weeks v. Baker & McKenzie* (1998) 63 Cal.App.4<sup>th</sup> 1128, which  
9 is recognized as one of the breakthrough sex harassment cases in the country. In 1997, I teamed  
10 up with the lead trial counsel in the *Weeks* case, Philip Edward Kay, who was recognized as one  
11 of the leading sex harassment attorneys in the country. I worked with Mr. Kay as an associate  
12 and then co-counsel for eight years during which time we tried numerous cases together.

13           8.       In 2005, I opened my own office. My experience as an attorney includes more  
14 than 40 trials and numerous other administrative hearings. I have been attorney of record in  
15 what I believe to be three of the largest jury verdicts at the time in harassment cases in  
16 California. A jury trial in 2002 resulted in a \$30.5 million jury verdict on behalf of six female  
17 employees who were sexually harassed while working for Ralphs Grocery Company. This case  
18 was published at *Gober v. Ralphs Grocery Co.* (2006) 137 Cal.App.4<sup>th</sup> 204. I also have argued  
19 several cases in state appellate courts and at the Ninth Circuit. I only represent plaintiffs and my  
20 practice focuses almost exclusively on employment cases. The vast majority of my cases,  
21 including the instant case, are taken on a contingency basis where I only collect fees if the case  
22 settles or we win at trial. Typically, I advance the costs of these contingent cases and I and my  
23 co-counsel advanced the costs in this case because our client did not have the financial resources  
24 to do so.

25           9.       I was trial counsel in 2000 in *Greene v. Dillingham Construction* which was an  
26 Alameda County race harassment case involving the use of a hangman's noose as a means of  
27 racial intimidation. The case resulted in a published decision establishing that multipliers are  
28 available under the Fair Employment Housing Act for factors including contingent risk. *See*

1 *Greene v. Dillingham Construction, N.A., Inc.* (2002) 101 Cal.App.4<sup>th</sup> 418. In the *Greene* case,  
 2 after the case was remanded by the Court of Appeal, Judge Demetrios Agretelis awarded a 1.7  
 3 multiplier on top of the lodestar of approximately \$993,000.

4 10. I currently have six other lawyers associated with my office, four of whom  
 5 assisted in this case for whom we are claiming time: Marqui Hood, Molly Durkin, Cimone  
 6 Nunley, and Julianne Stanford. One former partner, Navruz Avloni, and two former associates,  
 7 Noah Baron and Emily Kohlheim, also assisted in this case during their tenure with my firm.

8 11. Due to the small size of my firm, I must carefully screen the cases we take. We  
 9 have to balance the strengths of the case against risk factors such as who the defendant is and  
 10 what defenses are available. Some cases we take to try and advance the law, though we can only  
 11 take a few of these because of the likelihood of not prevailing and the costs to the firm associated  
 12 with taking such cases both in terms of attorney time and costs. As a consequence, we typically  
 13 take less than one case in a hundred. When I take a case for trial, I am not able to devote  
 14 significant resources to other matters when I am in trial prep and trial mode. I typically spend  
 15 approximately 80 to 100 hours per week when preparing for trial and participating in trial which  
 16 leaves scant time for other matters. Because of our limited resources, we are forced to turn away  
 17 cases that might otherwise be successful in order to provide full service to the clients we have  
 18 agreed to represent.

19 12. I have taught many classes on civil rights and trial tactics. Most recently, I taught  
 20 a class at Trial Lawyers University about the issues related to trying a case in federal court in 12  
 21 hours. I also taught a class at Trial Lawyer's University in Las Vegas, the San Francisco Trial  
 22 Lawyers Association (SFTLA), and the Marin Trial Lawyers Association (MTLA) on the lessons  
 23 learned from the *Diaz v. Tesla* case in terms of case strategy and the approach used to win the  
 24 case. I recently taught a class for Consumer Attorneys of California regarding how to be  
 25 successful in obtaining punitive damage awards. In November 2021 I taught a class on trying  
 26 civil rights cases to the National Employment Lawyers Association (NELA). More recently, I  
 27 taught a class on contingent worker liability issues. In 2015, 2017, 2019 and 2021, I was one of  
 28 the experienced lawyer-trainers who provided direct feedback to plaintiff's employment lawyers

1 at the California Employment Lawyers Association (CELA) Trial College held over three days at  
 2 Hastings College of Law. Bernard Alexander was the person who started the CELA Trial  
 3 College, and Dustin Collier is one of the more recent organizers of the CELA Trial College. I  
 4 taught a seminar on Sex Harassment at Boalt School of Law (now Berkeley Law), at the  
 5 University of California, Berkeley. I regularly teach a seminar on Law & Human Resources  
 6 Practices at Golden Gate University. In September 2012, I gave a day-long seminar with several  
 7 other attorneys and experts on conducting Focus Groups to CELA at its annual convention. In  
 8 2014, I published an article on sexual harassment in a national magazine for the American  
 9 Association of Justice named *Trial*. I have had numerous cases featured in newspapers from the  
 10 New York Times, Washington Post, Wall Street Journal, San Jose Mercury News, San Francisco  
 11 Chronicle, and Bloomberg News. I have had numerous cases featured on television programs  
 12 including CNN's Don Lemon Tonight, Good Morning America, CBS Evening News, Prime  
 13 Time Thursday and Channels 2, 3, 4, 7, and 11 in the Bay Area and Channel 40 in Sacramento.

#### **TIMEKEEPING PRACTICES**

15 13. My office keeps contemporaneous time records, accurate to one-tenth of one  
 16 hour. During the merits phase of this case, my attorney time was typically entered into the  
 17 MyCase time-keeping program. On those occasions, entries were made immediately after I  
 18 gained. For the relevant time entries from my partners and associates, I am familiar with their  
 19 time-keeping practices. I know they use MyCase to enter their time and that they typically  
 20 entered these time entries at or near the time when work was performed on cases. The same  
 21 practices are followed by my law clerks and paralegals. I know this to be true because I  
 22 monitored time entries of staff working on firm cases and periodically audited entries after they  
 23 were entered.

24 14. Throughout the time that I have worked on the *Diaz* case, I have been  
 25 conscientious in monitoring the time expended, and I endeavored to expend time in as efficient a  
 26 manner as possible to avoid duplicative time. In situations where time was being spent by two  
 27 attorneys on the same task, I endeavored to avoid double billing for these matters, except where  
 28 the tasks were different tasks or where multiple attorneys were needed for timely completion of a

task such as in a brainstorming or strategy session or where preparation was necessary for a deposition that I was going to take. One exception to this practice was the depositions of my client as it made sense for Ms. Avloni and myself to staff Mr. Diaz's deposition. Another exception was my overview of the case. I annotated all of the depositions and trial transcripts in a program called Transcript Pad to get an overview of the evidence and to see the various witnesses who testified to certain facts. This time-consuming practice helped other attorneys with witness examinations, but did not obviate the need for other attorneys to prepare their own examinations and review the transcripts anew. Multiple attorneys would typically collaborate on such things as the focus groups we ran or preparation and revision of demonstratives, and the opening and closing PowerPoint presentations.

#### **HOURLY RATES FOR CCRLG & CO-COUNSEL**

15. From 2012 to 2017, my hourly rate increased at a moderate rate, from \$525 to \$725 per hour. My 2012 hourly rate of \$525 was confirmed as reasonable in Los Angeles Superior Court by the Honorable Michelle R. Rosenblatt. My 2014 hourly rate of \$595 per hour was confirmed by the Honorable Jerome Benson for a sex harassment case. My 2016 hourly rate of \$650 per hour was confirmed by the Honorable William D. Claster in Orange County Superior Court as part of an award of \$689,310.04 in attorney's fees. My 2017 hourly rate of \$700 per hour was confirmed as reasonable by the Hon. Michael M. Markman of the Alameda County Superior Court for my work as lead counsel on a sexual harassment case where attorney's fees of \$819,300 were awarded based on a Section 998 offer of compromise under California law.

16. I am familiar with the *Laffey Matrix* and its historical use in the context of determining the reasonableness of attorney fee awards. The original Laffey Matrix was developed in 1982. It was approved for use for attorneys in the Washington D.C. area in *Laffey v. Northwest Airlines* (D.D.C. 1983) 572 F.Supp. 354. The *Updated Laffey Matrix* was developed in 1989 and approved for use in the D.C. area in *Salazar v. District of Columbia* (D.D.C. 2000) 123 F.Supp.2d 8, 13. Since that time, the United States District Court for the District Columbia has found expressly that the *Updated Laffey Matrix* is "more accurate" than the original Laffey Matrix. (*Smith v. District of Columbia* (D.D.C. 2006) 466 F.Supp.2d 151, 156; see also *Syers*

1 *Properties III, Inc. v. Rankin* (2014) 226 Cal.App.4<sup>th</sup> 691, 698-99 [approving use of Laffey  
 2 matrix with 9% “locality adjustment,” while noting that trial court is not obligated to follow the  
 3 Laffey matrix at all].) A true and correct copy of the *Updated Laffey Matrix* developed by Dr.  
 4 Michael Kavanaugh is attached as **Exhibit 5** to this declaration. It is also freely available online  
 5 on Dr. Kavanaugh’s website: <http://laffeymatrix.com/see.html> The Matrix does not address  
 6 attorneys of Mr. Rubin’s or Mr. Alexander’s experience or stature. According to the *Updated*  
 7 *Laffey Matrix*, my hourly rate for 2023 of \$975 is below the Laffey Matrix number of \$1,057 for  
 8 attorneys with over 20 years experience. Ms. Hood who has been practicing over 22 years has  
 9 an hourly rate of \$900 which is below the Laffey Matrix guide of \$1,057 for an attorney with  
 10 over 20 years of practice. Ms. Durkin who has been practicing over 17 years has a rate of \$750  
 11 per hour which is below the Laffey Matrix guide of \$878 per hour for attorneys with 11-19 years  
 12 of practice. Similarly, Mr. Collier’s rate of \$750 per hour is below the Laffey Matrix guides \$878  
 13 per hour. Ms. Corrine Johnson who graduated in 2012 and has a rate of \$825 is below the target  
 14 \$878 number for attorneys with her years of experience. Mr. Joshua Socks, a partner in the  
 15 Collier Law Firm (CLF) and a 2012 graduate, is seeking a rate of \$700 put the target rate for him  
 16 is \$878. Ms. Avloni (12 years out) at \$725 and Ms. Stanford (11 years out) at \$700 should have  
 17 rates of \$878. Britt Karp, a 2011 graduate, has a rate of \$675 which is below the Laffey Matrix  
 18 target of \$878. Drew Teti (2009) at \$550 is a bargain given his \$878 target. Ms. Cimone  
 19 Nunley’s rate at \$500 is also lower than the Laffey Matrix which shows a rate of \$538 for  
 20 someone with over five years’ experience. Ms. Elizabeth Malay, a 2012 graduate, has a rate of  
 21 \$400 which is well below the \$878 target for her time. In summary, all of CCRLG’s and CLF’s  
 22 attorneys have rates lower than those indicated as reasonable for the Laffey Matrix and many of  
 23 the other lawyers are also under the Laffey Matrix targets.

24 17. My 2021 hourly rate is \$975 per hour. I have at least one hourly client who  
 25 currently pays this hourly rate. The rates for my partners and associates are also the same rates  
 26 we charge hourly clients.

27 18. I currently serve as the Chair of the Civil Rights Forum, a plaintiff’s civil rights  
 28 attorney’s organization in the San Francisco Bay Area. The Civil Rights Forum has written



several amicus briefs on employment issues before the California Supreme Court. For example, an employment brief I wrote was accepted by the California Supreme Court in *Miller v. Department of Corrections* (2005) 36 Cal.4<sup>th</sup> 446. I also authored the request to the California Supreme Court, on behalf of the Civil Rights Forum, to grant review in *Roby v. McKesson HBOC* (2010) 47 Cal.4<sup>th</sup> 686. In 2017, I also edited and signed the Civil Rights Forum amicus brief to the U.S. Supreme Court case. In addition, I am an active member of the California Employment Lawyers Association (CELA) and have served on the CELA Jury Instructions Advisory Committee at various times for the last 10 years. I am also a member of the California State Bar's Labor and Employment Section, the National Employment Lawyers Association (NELA), Consumer Attorneys of California (CAOC), the San Francisco Trial Lawyer's Association (SFTLA), the American Association of Justice (AAJ), the Bar Association of San Francisco (BASF), the Marin Trial Lawyers Association (MTLA), and the Alameda County Bar Association (ACBA). I have served as a member of the San Francisco Delegation to the California State Bar Conference of Delegates and I served as the Chair of the Labor and Employment section of that delegation and as a member of the Executive Committee for over 10 years.

19. For every year since 2010, I have been named by Northern California Super Lawyers magazine as one of the top attorneys in Northern California. On information and belief, only five percent of the lawyers in the covered region are named by Super Lawyers. Each year since 2010, I have been ranked through the multi-step, peer-review process employed by Super Lawyers as one of the top Plaintiff's Employment Lawyers in Northern California. In 2021, the National Trial Lawyers Association named me to the Top 100 list of employment trial lawyers in California and the Top 10 list of Civil Rights attorneys in Northern California.

20. In 2022, the National Trial Lawyers Association, a group of over 5,000 civil and criminal defense attorneys from all 50 states, named me Trial Lawyer of the Year for my work on the *Diaz v Tesla* case.

21. Cimone Nunley is an associate attorney in my firm who has been working with me since the summer of 2016 after she finished her first year of law school. She graduated from



the University of California, Davis, King Hall School of Law in 2018. In 2021, Ms. Nunley has been ranked through the multi-step, peer-review process employed by Super Lawyers as one of the Rising Stars Plaintiff's Employment Lawyers in Northern California, which is only given to the top 2.5% of attorneys. Ms. Nunley's hourly rate for 2023 is \$500 per hour.

22. Marqui Hood is a partner in my firm who was been working with me for approximately seven years. Ms. Hood graduated from the University of California at Los Angeles School of Law in 2001. Her undergraduate degree is from Wesleyan. After law school, Ms. Hood clerked for the Hon. Raymond Fisher on the 9<sup>th</sup> Circuit Court of Appeals in Pasadena, California. Her hourly rate is \$900 per hour.

23. Molly Durkin is a partner in my firm who was been working with me for approximately seven years. Ms. Hood graduated from the University of California, School of Law, San Francisco (formerly Hastings) in 2006. Her undergraduate degree is from Barnard College. Her hourly rate is \$750 per hour.

24. Navruz Avloni is a former partner in my firm who has worked with me since 2014 until she left my firm in early April 2022. Ms. Avloni graduated from the University of California, Davis, King Hall School of Law in 2011. Ms. Avloni has tried several matters with me including an arbitration against Tesla in 2019 in the *Lambert v. Tesla* matter. Ms. Avloni was the primary person propounding and responding to discovery and she also took and defended several depositions in the *Diaz* matter. Each year since 2018, Ms. Avloni has been ranked through the multi-step, peer-review process employed by Super Lawyers as one of the Rising Stars Plaintiff's Employment Lawyers in Northern California. In 2017, Ms. Avloni was recognized by The National Advocates as Top 40 Under 40. In 2021, Ms. Avloni was selected by Best Lawyers as a member of "Ones to Watch" in the category of Commercial Litigation—Plaintiffs. In 2023 I understand her hourly rate is \$725 per hour.

25. Julianne Stanford is a partner in my firm who has been working with me since she took the Bar in 2012. Ms. Stanford graduated from the University of San Francisco School of Law in 2012. She has tried four cases including a 10-week trial against the state of California. Each year since 2016, Julianne Stanford has been ranked by Super Lawyers as one of the Rising

1 Stars Plaintiff's Employment Lawyers in Northern California. In 2021, Ms. Stanford was  
2 selected by the National Trial Lawyers Association as one of the Top 40 Under 40 for  
3 employment litigators in Northern California. In 2023, her hourly rate is \$700 per hour.

4 26. Ms. Emily Kohlheim who assisted with the retrial is a 2021 Berkeley Law  
5 graduate whose hourly rate is \$425 per hour. Noah Baron who was an associate in my firm prior  
6 to the first trial is a 2015 graduate of Georgetown Law Center. I understand his current hourly  
7 rate is \$600 per hour.

8 27. Sabrina Grislis is a senior paralegal in my office. Her hourly rate is \$225 per  
9 hour. Jean Ger was a senior paralegal in my firm whose hourly rate is the same as Ms. Grislis's  
10 rate. Teodora Gagauz is a paralegal in my firm whose hourly rate is \$225. Cameron Hartquist is  
11 a paralegal in my firm whose hourly rate is \$225 per hour. Susan Organ is a legal assistant and  
12 trial consultant in my office who helps prepare cases for trial and create visuals that are used in  
13 trial. Her visual images were extremely helpful in the instant case. Her hourly rate is \$225 per  
14 hour.

15 28. Based on my constant interactions with my colleagues through organizations like  
16 CELA, CAOC, NELA, BASF, and ACBA, I am familiar with the prevailing rates for  
17 employment lawyers in the San Francisco Bay Area. In addition, I often provide declarations for  
18 other lawyers who are seeking attorney's fees, so I keep up with prevailing rates that way. In  
19 addition, I follow and research the rates that firms like Quinn Emanuel and other defense firms  
20 charge so that I can ensure that the rates of our firm and those for whom I submit attorney's fees  
21 declarations are comparable. Based on these experiences, I can state unequivocally that the rates  
22 claimed by my co-counsel are fair and reasonable and commensurate with the prevailing rates in  
23 the San Francisco Bay Area.

24 29. As noted in paragraph 41 *supra*, I had always wanted to try a case with Bernard  
25 Alexander who is recognized as one of the best plaintiff's trial lawyers in California. Mr.  
26 Alexander and I have collaborated together on numerous matters and I am familiar with his work  
27 and the work of other members of his firm. His rate of \$1200 per hour is actually on the low side  
28 of rates for trial attorneys of his skill and experience. The rates of his partners and associates are

1 also well within the market rates for similarly situated attorneys including Mr. Karp (\$675), Ms.  
2 Gill (\$450) and Ms. Khoury (\$350).

3 30. Working with Michael Rubin, I have found him to be exceptional in every way  
4 and well worth his hourly rate of \$1275 per hour. This rate seems to be on the low side for  
5 someone with his reputation and skill based on review of similar rates from defense firms. His  
6 associate Jonathan Rosenthal is superb with keen insights and depth of knowledge beyond his  
7 years, making his requested rate of \$650 more than reasonable. I also was fortunate to work with  
8 Mr. Rubin's partner Corrine Johnson. Again, she is superb as you would expect from Altschuler  
9 Berzon and her rate of \$825 is more than reasonable and in line with market rates in the Bay  
10 Area. Sam Hull at \$550 per hour is also within the range of similar attorneys with his experience  
11 at firms in San Francisco.

12 31. As noted in paragraph 44 *supra*, Dustin Collier is a sought-after trial attorney.  
13 Although he only graduated in 2009 from Berkeley Law, he has already achieved much success  
14 and received numerous accolades. His \$750 per hour rate is reasonable and similar to trial  
15 attorneys with his skill and acumen. I am also familiar with his crack team of attorneys. His  
16 partners Josh Socks (\$700), Drew Teti (\$550) and Liz Malay (\$400) are all accomplished  
17 lawyers who have helped Mr. Collier obtain his many successes. Their rates are on the low side  
18 for attorneys with their talents and successes.

### 19 **WORK ON THE INSTANT CASE**

20 32. My firm first met Mr. Owen Diaz in 2017 when Mr. Diaz approached us to  
21 provide evidence in the case of *DeWitt Lambert v. Tesla, Inc.* He then asked my firm to  
22 represent him in relation to his case against Tesla, Inc. Upon review of Mr. Diaz's records, it  
23 appeared that his claims were not actionable under the Fair Employment Housing Act, but would  
24 need to be litigated under 42 U.S.C. § 1981 due to expiration of the applicable statutes of  
25 limitations. This also meant that his claims would likely end up being litigated in federal court,  
26 where risks are higher as there is more limited discovery and a jury verdict requires unanimity,  
27 without the benefit of jury *voir dire*, advantages that are present in state court. Additionally, Mr.  
28 Diaz worked at Tesla via a contracting agency, and at the time I accepted representation of Mr.

1 Diaz's claims it was not clear that contractors had standing to sue under Section 1981. The only  
2 documentary evidence Mr. Diaz had to support his claims at that time was a photograph of the  
3 racist "pickaninny" drawing.

4 33. The substantial risks of litigation against Tesla were highlighted by the results of  
5 the first race harassment case I accepted and litigated against Tesla, *Dewitt Lambert v. Tesla, Inc.*  
6 After filing the case in Alameda County Superior Court, the case was compelled to arbitration—  
7 as Tesla routinely requires its employees and contractors to sign arbitration agreements. In the  
8 *Lambert v. Tesla* matter, my firm expended well over \$1.1 million in attorney's fees and out-of-  
9 pocket costs of \$104,514.43, all of which were lost when the arbitrator ruled against us, despite  
10 having video evidence of use of the N-word inside the Tesla factory. That loss was sobering as to  
11 the risks in these types of cases. In addition, I reviewed statistical evidence that the chances of  
12 winning a race harassment case in federal court were much less favorable than winning in state  
13 court.  
14

15 34. At the outset of the *Lambert* litigation, Tesla's general counsel, Todd Maron,  
16 bluntly informed me: "We will bury you. You will never see a penny. We will appeal forever."  
17 This statement has perfectly described Tesla's litigation strategy in the instant *Diaz* matter:  
18 litigation that has stretched on for six years, with two trials and 491 docket entries to date.  
19 Throughout the course of this action, Tesla's counsel has buried my office in voluminous and  
20 often redundant filings, and have refused to engage in meaningful settlement negotiations.  
21 Tesla's counsel continue to seek the very same result announced by Mr. Maron: in meet and  
22 confer efforts leading up to the damages-only retrial, counsel repeatedly affirmed their intent to  
23 avoid paying Plaintiff a cent of his proven damages, stating multiple times they were aiming for  
24 a "zero-damages verdict" in spite of the first jury's liability findings.

25 35. Tesla's counsel also often refused to come to a compromise on basic issues like  
26 jury instructions, verdict forms, or trial exhibits. This required my office to file competing  
27 versions of these documents with the Court, coupled with supporting authority, for the Court to  
28 rule on.

DISCOVERY

36. Discovery in this matter stretched on for two-and-a-half years, from the filing of the complaint in 2017 through late 2019.

37. During the discovery phase, my firm took or defended the depositions of 25 witnesses, all of which were essential to the case:

- Plaintiff.
- CitiStaff's person most knowledgeable: Plaintiff was employed at Tesla through contracting agency CitiStaff, and their Person Most Knowledgeable contributed essential information about Plaintiff's employment and Tesla's contractor employment structure.
- nextSource's person most knowledgeable: nextSource hired Plaintiff via CitiStaff to work at the Tesla factory, and nextSource managers investigated Plaintiff's complaints. Their person most knowledgeable provided information about nextSource's contract with Tesla (of which Plaintiff was a third-party beneficiary), information about Tesla's contractor employment structure, and information about Plaintiff's complaints of racial harassment.
- West Valley's person most knowledgeable: Plaintiff's son, Demetric Di-az, worked at Tesla through contracting agency West Valley. Their person most knowledgeable provided information about the contractor employment structure at Tesla, as well as information about Demetric's employment with Tesla and his complaints.
- Tesla's person most knowledgeable: Tesla's person most knowledgeable provided testimony regarding Tesla's antiharassment policies and Plaintiff's employment at the Tesla factory.
- Tesla facilities manager Andres Donet: Mr. Donet provided information about racist graffiti in the restrooms at Tesla, and Tesla's procedures and practices when it came to investigating and removing such graffiti.

- 1 • Plaintiff's son Demetric Di-az: Plaintiff witnessed an act of overt racial  
2 harassment against Mr. Di-az, and Mr. Di-az was thus a percipient witness in the  
3 instant action. Tesla noticed his deposition.
- 4 • Plaintiff's wife Demetrica Holmes: Ms. Holmes was an emotional distress witness  
5 for Plaintiff. West Valley noticed her deposition, but Tesla attended and  
6 participated in questioning. Ultimately the parties stipulated to excluding Ms.  
7 Holmes as a witness to preserve her privacy surrounding her mental health  
8 struggles.
- 9 • Tesla manager Ed Romero: Mr. Romero was Plaintiff's immediate supervisor for  
10 most of Plaintiff's tenure at Tesla. He testified about Plaintiff's employment at  
11 Tesla and Plaintiff's complaints of harassment.
- 12 • Tesla HR staff Erin Marconi: Ms. Marconi was the human resources staffer  
13 assigned to Plaintiff's area of the factory. She testified regarding Tesla's response  
14 to complaints of racial harassment and Tesla's antiharassment policies.
- 15 • Chartwell HR staff Jackelin Delgado: Ms. Delgado investigated Plaintiff's  
16 January 2016 complaint of racial harassment against supervisor Ramon Martinez.
- 17 • Tesla manager Javier Caballero: Mr. Caballero was the supervisor who called  
18 Plaintiff's son a racial slur as Plaintiff watched.
- 19 • Plaintiff's stepdaughter La'Drea Jones: Ms. Jones was an emotional distress  
20 witness for Plaintiff. Though West Valley's counsel noticed the deposition,  
21 Tesla's counsel attended the deposition and participated in questioning.
- 22 • Plaintiff's coworker Lamar Patterson: Mr. Patterson was Plaintiff's coworker and  
23 witnessed several incidences of racial harassment against Plaintiff, in addition to  
24 corroborating Plaintiff's reports of racist graffiti in the restrooms of Tesla's  
25 factory.
- 26 • Economist Charles Mahla: Mr. Mahla testified regarding Tesla's value. Tesla  
27 noticed his deposition.
- 28

- 1 • Plaintiff's coworker and sometimes supervisor Michael Wheeler: Mr. Wheeler  
2 worked alongside Plaintiff and witnessed racial harassment against Plaintiff,  
3 corroborated Plaintiff's account of racist graffiti in the restrooms of the factory  
4 and testified regarding his own experiences of harassment at the Tesla factory.
- 5 • CitiStaff manager Monica DeLeon: Ms. DeLeon was Plaintiff's manager from his  
6 staffing agency. She testified regarding Plaintiff's employment at the Tesla  
7 factory and the contractor employment arrangement at Tesla.
- 8 • HR expert Amy Oppenheimer: Ms. Oppenheimer testified regarding proper  
9 Human Resources policies and implementation of said policies. Tesla noticed her  
10 deposition.
- 11 • Psychiatrist Anthony Reading: Dr. Reading testified regarding Plaintiff's  
12 emotional distress. Tesla noticed his deposition.
- 13 • West Valley manager Rovilla Wetle: Ms. Wetle was a manager at Demetric Di-  
14 az's staffing agency, West Valley. She testified regarding Mr. Di-az's  
15 employment at the Tesla factory and his complaints of harassment.
- 16 • Plaintiff's supervisor Tomatsu Kawasaki: Mr. Kawasaki was Plaintiff's  
17 immediate supervisor during the first months of Plaintiff's employment at the  
18 Tesla factory. He testified regarding Plaintiff's complaints of harassment and the  
19 racially hostile work environment in the Tesla factory.
- 20 • Me-Too witness Titus McCaleb: Mr. McCaleb worked at the Tesla factory  
21 approximately six months after Plaintiff left, and knew Plaintiff's supervisors Ed  
22 Romero and Michael Wheeler. He also testified about Tesla's failure to remediate  
23 the racially hostile work environment following Plaintiff's departure from Tesla.  
24 Tesla noticed his deposition.
- 25 • Chartwell manager Veronica Martinez: Ms. Martinez participated in the  
26 investigation into Plaintiff's January 2016 complaint regarding the racist drawing  
27 from Ramon Martinez.  
28



- Tesla manager Victor Quintero: Mr. Quintero was Plaintiff's second-level supervisor at the Tesla factory. He created the contractor employment structure at Tesla, and testified regarding Plaintiff's employment at the Tesla factory and Plaintiff's complaints of harassment.
- nextSource manager Wayne Jackson: Mr. Jackson was the on-site contractor supervisor at the Tesla factory. He testified about the racially hostile work environment at the Tesla factory, as well as testifying about Plaintiff's complaints of racial harassment.

38. Plaintiff also conducted written discovery in this matter. Plaintiff propounded eight sets of interrogatories, 12 sets of document requests, and two sets of requests for admissions across the four defendants in this action. All of this discovery was reasonably necessary due to Tesla's convoluted contractor employment arrangement. After the first round of depositions in this matter, it became clear that investigatory duties and documentation of investigations was divided up between all four defendants. To obtain complete discovery into Plaintiff's January 2016 complaint regarding the racist drawing, for example, we had to depose nine witnesses (Plaintiff, Mr. Romero, Mr. Quintero, Mr. Wheeler, Mr. Patterson, Ms. DeLeon, Ms. Martinez, Mr. Jackson, and Ms. Delgado) and seek documents from three defendants (Tesla, nextSource, and CitiStaff). Regarding the October 2015 elevator attack, we had to depose seven witnesses (Plaintiff, Mr. Romero, Mr. Quintero, Mr. Jackson, Ms. DeLeon, Mr. Kawasaki, and Ms. Marconi) and seek documents from three defendants (Tesla, nextSource, and CitiStaff). Many of the incidents complained of by Mr. Diaz required this amount of discovery.

39. Discovery in this matter was made more contentious by Tesla's refusal to provide basic, plainly discoverable information that should have been identified in its initial disclosures, such as the names and contact information of Plaintiff's coworkers. This intransigence forced us to engage in copious meet and confer efforts, in-person in accordance with the Local Rules. Plaintiff filed six discovery dispute letters, spanning a range of topics:

- 1           • Dkt. 79: This dispute concerned Plaintiff’s request for documents in the *Lambert*

2           matter. Mr. Lambert worked at Tesla around the time Mr. Diaz did, and

3           experienced similar racial harassment. Though the Court denied Plaintiff’s

4           motion, it noted Tesla was elevating “form over substance,” urged Tesla to

5           consider “whether [the] dispute was more about admissibility than

6           discoverability,” and chastised Tesla to “focus on the importance of the issue

7           before bringing it to court.” Dkt. 80. Tesla did not participate in meaningful meet

8           and confer efforts with Plaintiff and refused to make the *Lambert* documents

9           available during the discovery phase of this case.
- 10          • Dkt. 86: This dispute concerned Plaintiff’s request to depose additional witnesses

11          above the 10-deposition limit in the Federal Rules. The court granted Plaintiff’s

12          request and stated that Tesla could not call any witness at trial that Plaintiff did

13          not depose. Dkt. 93.
- 14          • Dkt. 88: This dispute concerned Tesla’s discovery responses, specifically its

15          refusal to produce (1) the contact information of Plaintiff’s coworkers, (2) other

16          complaints of racial harassment, (3) Plaintiff’s request for “me-too” evidence, (4)

17          Plaintiff’s request for photos or documents concerning racist graffiti in the

18          restrooms, (5) Plaintiff’s request for investigations into other complaints of racial

19          harassment, (6) Plaintiff’s request for messages sent by Tesla CEO Elon Musk

20          concerning the use of slurs in the factory, and (7) Plaintiff’s request for contracts

21          between Tesla and the various staffing agencies. Subject to certain limitations,

22          the court granted all of Plaintiff’s requests. Dkt. 93.
- 23          • Dkt. 101: This dispute concerned Tesla’s Person Most Knowledgeable

24          deposition, at which Tesla’s counsel stated that Tesla was objecting to or not

25          producing its person most knowledgeable on numerous topics. Although the

26          Court denied Plaintiff’s request, I believe it was reasonable to pursue it, as Tesla

27          had refused to allow its PMK to testify on key topics like the business

28

relationships among various contract agencies, complaints of discipline against harassers, or investigations into Plaintiff's complaints of harassment. Dkt. 110.

- Dkt. 103: This dispute concerned Plaintiff's request for a site inspection of Tesla's factory. Though the Court denied this request, it was reasonable of Plaintiffs to pursue: many of Tesla's defenses centered on the size and layout of its factory, and in discovery Tesla only produced a small, mostly illegible schematic that did not fully show all of Plaintiffs' work areas. Dkt. 110.
- Dkt. 105, 106: This dispute concerned Plaintiff's request for a deposition of Tesla facilities manager Andres Donet. After the close of discovery, Tesla for the first time produced an e-mail depicting racist graffiti in Tesla's restrooms that demonstrated Mr. Donet was responsible for removing such graffiti. Tesla sent its position to Plaintiff just 17 minutes before the midnight filing deadline and included new, substantive arguments that Plaintiff did not have an opportunity to respond to. Accordingly, Plaintiff had to file a corrected brief to address the factual inaccuracies and new arguments in Tesla's position. The Court granted Plaintiff's request. Dkt. 110.

#### MOTIONS AND OTHER FILINGS

40. True to Mr. Maron's word, Tesla's counsel sought to "bury" Plaintiff by continually filing duplicative motions and forcing Plaintiff to engage in substantial motion practice to combat Tesla's continued discovery abuse. Over the course of this litigation, the parties engaged in voluminous motion practice, including:<sup>1</sup>

- Administrative motions to seal: Tesla marked as confidential almost every document produced in discovery, even routine e-mails concerning basic employment matters. If Plaintiff wanted to use the documents produced in

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<sup>1</sup> Plaintiff has not included in this fee request the time counsel reasonably spent briefing or opposing motions concerning other parties, such as the staffing agencies' motions for summary judgment or Tesla's motion to compel former plaintiff Lamar Patterson's case to arbitration.

discovery in a filing, we had to incur extra time preparing and filing an administrative motion to seal nearly every filing in the case.

- Tesla’s motion for summary adjudication (Dkt. 119): Tesla filed a motion for summary adjudication of Plaintiff’s Unruh Act and punitive damages claims. Plaintiff did not oppose the motion with respect to the Unruh Act claims because of our strategic decision to narrow the issues before the court in advance of trial. Plaintiff prevailed on the motion with respect to punitive damages. Dkt. 144 25:20-26:20.<sup>2</sup>
- Tesla’s motion to retain confidentiality (Dkt. 122): After Plaintiff challenged Tesla’s overbroad and indiscriminate designations of documents as “confidential,” Tesla refused to engage in meaningful meet and confer efforts and instead filed a motion to retain confidentiality, requiring an opposition from Plaintiff. Ultimately, the Court vacated the hearing and observed, “it appears that Tesla has over-designated and should reconsider its designations in light of the law concerning sealing.... If unmeritorious disputes remain that require Court intervention, costs may be imposed.” Dkt. 136. Notably, Tesla only withdrew its designations for the trial exhibits.
- Plaintiff’s motion for sanctions (Dkt. 146): Following the Court’s 2019 order for Tesla to produce the contact information of Plaintiff’s coworkers, Tesla refused—even for individuals whom it knew had worked with Plaintiff like harassers Ramon Martinez and Robert Hurtado—in spite of diligent meet and confer efforts

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<sup>2</sup> Although the punitive damages argument concerned both Plaintiff and his son, former plaintiff Demetric Di-az, the factual predicates and legal bases for Plaintiff’s arguments were identical to Mr. Di-az, requiring virtually no work from Plaintiff’s counsel to independently address Mr. Di-az’s claims. Plaintiff is therefore seeking compensation for all time reasonably spent in bringing his opposition. Plaintiff also minimized the amount of time dedicated to filing this motion, as Plaintiff had previously briefed the punitive damages arguments in opposing the other defendants’ motions for summary judgment.

from Plaintiff. This was especially troubling given that Tesla included Martinez—a then-current Tesla employee—on its witness list at the first trial and, despite claiming that there was “no evidence” that Hurtado worked with Plaintiff in subsequent filings, including Hurtado on its witness list *for the first time on retrial*. Although the Court denied Plaintiff’s motion, it was reasonably brought given the self-executing nature of witness preclusion sanctions under Rule 37 and Tesla’s refusal to comply with the Court’s previous orders. Dkt. 160.

- Pretrial briefing requested by the Court (Dkt. 240): In advance of the first trial, Tesla argued that discovery responses from the staffing agencies should be inadmissible as evidence. Tesla filed briefing on this issue, again requiring a response from Plaintiff. Dkt. 245, 246. The Court denied Tesla’s briefing from the bench.
- Tesla’s motion to strike expert Chip Mahla’s testimony (Dkt. 281): Tesla filed a motion to strike the testimony of economist Chip Mahla in the first trial, necessitating a response from Plaintiff. Dkt. 286. The Court denied the motion. Dkt. 303.
- Tesla’s motion for Judgment as a Matter of Law (Dkt. 282): Tesla filed a motion for judgment as a matter of law during the first trial, claiming Plaintiff had not established that he was in a contractual relationship with or was an intended beneficiary of a contract with Tesla, necessitating a response from Plaintiff. Dkt. 287. The Court denied Tesla’s motion. Dkt. 303.
- Tesla’s motion for judgment as a matter of law, new trial, or remittitur (Dkt. 317): Tesla moved for judgment as a matter of law or new trial on the grounds that the liability findings were not supported by evidence, and moved for a remittitur on the compensatory and punitive damages awards—again requiring a response from Plaintiff. Dkt. 321. The Court upheld the first jury’s liability findings but remitted the \$137.9 damages award to \$13.5 million. Dkt. 317. Ultimately, given Tesla’s

threats (“You will never see a penny. We will appeal forever.”), uncertainty over whether Tesla would pay, desire to avoid the expense of appeal, and a desire to preserve his right to appeal the remitted amount, Plaintiff opted for a damages-only retrial over the proffered remittitur.

- Tesla’s second new trial motion (Dkt. 359): After Plaintiff rejected the remittitur and opted for a damages-only retrial, Tesla continued to seek a new trial on liability—yet again requiring a response from Plaintiff. The Court rejected Tesla’s order, noting, “... I already decided this question. There appears to be no reason—aside from strategic gamesmanship—that Tesla could not have made these same arguments when I previously decided this issue. Tesla’s motion is judicially estopped and procedurally barred.” Dkt. 365 1:15-19.
- Joint Pretrial Conference Statement (Dkt. 398): Though the Court had already *twice* rejected Tesla’s attempts to retry liability, Tesla returned to this argument in the joint pretrial conference statement. Tesla argued that “the Court already determined that the second jury will need to make an independent assessment of whether Mr. Diaz is entitled to punitive damages,” again requiring Plaintiff to brief this issue for the Court. Dkt. 398 4:19-25.
- Supplemental briefing regarding Michael Wheeler (Dkt. 413): After the Court rejected Tesla’s motion *in limine* to exclude Mr. Wheeler’s testimony, Tesla again attempted to relitigate the issue, claiming at the pretrial conference that there was no evidence Plaintiff was aware of an alleged racial hate crime against Mr. Wheeler and thus Mr. Wheeler’s testimony should not be admissible, leading the Court to request supplemental briefing. Dkt. 409. The Court ultimately ruled in Plaintiff’s favor and allowed the testimony, though as discussed blow, Tesla engaged in substantial misconduct in an attempt to undercut Mr. Wheeler’s testimony. Dkt. 417.

- 1 • Tesla’s objections to expert Amy Oppenheimer’s testimony (Dkt. 422): In  
2 advance of the second trial, Tesla sought to exclude the testimony of expert Amy  
3 Oppenheimer, again necessitating a response from Plaintiff. The Court overruled  
4 the objections. Dkt. 434.
- 5 • Plaintiff’s objections to Tesla’s opening statement (Dkt. 433): Once the damages-  
6 only retrial began, Tesla’s counsel began its opening statement with multiple  
7 incidences of misconduct, first claiming that harasser Ramon Martinez’s conduct  
8 was not attributable to Tesla (after the first jury’s determination to the contrary),  
9 and that Plaintiff was not harmed by Tesla’s conduct (again contrary to the  
10 established liability findings). The Court denied Plaintiff’s objections as they  
11 were not timely made; however, the objections were reasonably brought: Plaintiff  
12 had already made multiple objections during Tesla’s opening statement and did  
13 not wish to create a perception that his counsel was attempting to hide the truth  
14 from the jury. Dkt. 438.
- 15 • Tesla’s impeachment brief regarding Michael Wheeler (Dkt. 440): During the  
16 retrial, for the first time, Tesla ambushed witness Michael Wheeler with an e-mail  
17 purporting to show it had investigated Mr. Wheeler’s complaint of a racial hate  
18 crime—and found it was not racial in nature at all. Over counsel’s objections, and  
19 after the Court ruled the exhibit inadmissible, Tesla’s counsel pretended to read  
20 the e-mail into the record while materially misrepresenting its contents. The Court  
21 subsequently ordered Tesla to brief the issue, again necessitating a response from  
22 Plaintiff. Dkt. 441. Ultimately, the Court upheld Plaintiff’s objections and  
23 chastised counsel on the record for misrepresenting the contents of the email.
- 24 • Plaintiff’s brief regarding improper questioning on excluded evidence of  
25 Plaintiff’s criminal history (Dkt. 446): In advance of both trials, the parties  
26 stipulated that no evidence or testimony would be presented regarding Mr. Diaz’s  
27 criminal history; nevertheless, Tesla’s counsel questioned Mr. Diaz, over  
28



1 counsel's objections, about the redacted portions of his application for  
2 employment—which concerned that same criminal history. Plaintiff could not  
3 testify about his criminal history, so he appeared evasive at best and like a liar at  
4 worst on the stand. This required Plaintiff to promptly file supplemental briefing,  
5 which resulted in a curative instruction. Dkt. 446.

- 6 • Plaintiff's briefing regarding improper accusations that Plaintiff was a serial racial  
7 and sexual harasser (Dkt. 452): While cross-examining Mr. Diaz, Tesla's counsel  
8 accused him of racial and sexual harassment against two coworkers over  
9 counsel's objections—with no basis in any type of admissible evidence and no  
10 conceivable relevance to Plaintiff's case. This likewise required Plaintiff to  
11 promptly move for relief in the form of a curative instruction, which the Court  
12 granted from the bench.
- 13 • Plaintiff's motion for mistrial (Dkt. 453): By the second-to-last day of trial,  
14 Tesla's counsel had engaged in numerous instances of misconduct, including by  
15 referring to settlements with dismissed parties, baselessly accusing Mr. Diaz of  
16 misconduct like forging a doctor's note and harassing coworkers, attacking  
17 Plaintiff's counsel, questioning Plaintiff about excluded evidence of his criminal  
18 history, misrepresenting the contents of the Wheeler e-mail to the jury, and  
19 introducing new evidence in violation of the Court's orders. The cumulative effect  
20 of this misconduct required Plaintiff to promptly file a mistrial motion, on which  
21 the Court deferred ruling. Plaintiff renewed the motion following the trial. Dkt.  
22 478. Though the Court rejected the renewed motion, it agreed with Plaintiff that  
23 Tesla had engaged in serious, and intentional, misconduct. Dkt. 491.
- 24 • Tesla's motion to alter or amend the judgment (Dkt. 479): Following the retrial,  
25 Tesla again moved to reduce the punitive damages to a 9:1 ratio from the 17:1  
26 ratio awarded by the second jury. This again required a responsive filing from  
27 Plaintiff and the Court denied Tesla's motion in its entirety, holding that Tesla's  
28

highly reprehensible conduct warranted a double-digit punitive multiplier. Dkt. 491.

- Plaintiff's Notice of New Evidence (Dkt. 485): Following the close of discovery, Plaintiff learned that Tesla had withheld photographic evidence of racial graffiti in the restrooms during Plaintiff's tenure at Tesla—no such photographic evidence was ever introduced at either trial. Though the Court rejected Plaintiff's request for a new trial on this ground, it did hold the document should have been disclosed during discovery. Dkt. 491.

#### **ASSOCIATING OTHER FIRMS INTO THE *DIAZ* MATTER**

41. In 2019, I decided that my firm needed additional help to try the case. I have known Bernard Alexander since at least 2008, and he and I had numerous discussions about cases and case strategy as well as working together through CELA's trial college. Mr. Alexander enjoys a reputation as one of the best civil rights trial attorneys in the state, and I knew that he would be a tremendous asset to the *Diaz* team. Based on our years of experience together, I knew that we could work seamlessly together. In addition, I knew that Mr. Alexander had won a considerable victory for a client in a previous case where the defendant was represented by Tesla's then lead counsel, Tracy Kennedy. After conferring with my clients, I asked Mr. Alexander to join the case, and he accepted. At this point, discovery was nearly complete and we began to focus on trial strategy and trial themes.

42. For purposes of the first trial, we decided that the in-trial team would consist of myself, Mr. Alexander, Ms. Nunley and Sabrina Grislis, my trial paralegal. In addition, Ms. Avloni would attend trial to help summarize the proceedings, help with strategy and begin focusing on evidence for closing argument. Ms. Susan Organ also reviewed the daily transcripts to help put together the closing PowerPoint slides. Leading up to trial, we worked as a team preparing witnesses and evidence and developing the themes and arguments to be made at trial. Additional firm members were brought in for specific issues as needed.

1           43. Numerous different sources identified the first verdict of \$136.9 million as the  
2 largest race harassment verdict in American history. The verdict was extensively covered by  
3 numerous national and international news media. These included appearances for myself and my  
4 client on CNN's Don Lemon show, Good Morning America, The NBC Nightly News, The  
5 Washington Post, The New York Times, Bloomberg News, The Los Angeles Times, the San  
6 Jose Mercury News, The San Francisco Chronicle, USA Today, as well as numerous  
7 publications overseas.

8           44. After we won the first verdict, Tesla fired its trial counsel Sheppard Mullin and  
9 hired Quinn Emanuel with its named partner Kathleen Sullivan as the lead. To counter this legal  
10 firepower, I determined that we needed additional post-trial and appellate expertise. I was  
11 fortunate to be able to recruit Michael Rubin from Altshuler Berzon LLP to join Mr. Diaz's  
12 team. Mr. Rubin enjoys a reputation as one of the best appellate attorneys in California if not the  
13 United States when it comes to employment and civil rights matters. Mr. Rubin and his team  
14 provided vital strategy, drafting, research and direction for all post-trial matters. Mr. Rubin also  
15 took the lead on efforts to have the Court certify a question to the 9<sup>th</sup> Circuit after the Court's  
16 remittitur. For the retrial, Altshuler Berzon was integrated into the retrial team to help prepare  
17 the case for retrial. Mr. Rubin's associate Jonathan Rosenthal attended trial in person to provide  
18 appellate direction if needed and help with trial strategy and Mr. Rubin attended remotely and  
19 stepped in on several occasions to argue points of last were raised during the trial.

20           45. After being informed that Quinn Emanuel's Alex Spiro would be lead counsel for  
21 Tesla on retrial, I contacted Dustin Collier, whom I have known and watched in trial over the  
22 years. Mr. Collier and I have worked in the CELA Trial College together, and I have always  
23 been impressed by his intelligence and keen strategic mind. Given his trial skills, I thought it  
24 would be extremely valuable to add Mr. Collier to our trial team. In December 2022, I began  
25 talking to him about strategy in the case, and in early 2023 Mr. Collier and his firm were added  
26 to Mr. Diaz's trial team. One of Mr. Collier's jobs was to help prepare Mr. Diaz for cross  
27 examination by Mr. Spiro. In addition, he and his team ended up handling numerous witnesses in  
28

1 the retrial to free up time for me to coordinate the team and for Mr. Alexander to focus on  
2 messaging and opening and closing arguments.

3 46. I also began researching and analyzing Mr. Spiro's trial techniques. I reviewed  
4 transcripts from trials in which he had been counsel and I attended several days of the *Littleton v.*  
5 *Musk* trial before Judge Chen in January 2023.

6 47. Because Ms. Avloni left my firm in 2022, I needed an additional attorney from  
7 my firm to assist with strategy and drafting. Accordingly, I added Ms. Marqui Hood to the trial  
8 team. Ms. Hood took over for the tasks that Ms. Avloni had previously performed.

9 48. Tesla's counsel made it clear to the Court and to Plaintiff's counsel that they  
10 intended to try a different case to the jury in the retrial. This of course was by necessity because  
11 liability was established and because they made clear that they intended to attack Mr. Diaz and  
12 his witnesses on their credibility. As a result, we had to re-analyze the deposition transcripts and  
13 the transcripts from the first trial. This also required additional work with Mr. Diaz to try to  
14 prepare him against the expected attacks on his character. We conducted numerous focus groups  
15 to help with messaging, particularly for the second trial. Based on David Ball's most recent book  
16 on damages, Mr. Collier and I decided to try a different approach to showing Mr. Diaz's  
17 damages by focusing more on the impact of the conduct. It was also hoped that this approach  
18 would not be easily attacked by Tesla.

19 49. For purposes of the second trial, we had many more team members to coordinate  
20 against the significant resources Quinn Emanuel was putting into the case. We understood that  
21 we had to look at everything afresh to counter Tesla's anticipated new approach. I acted as the  
22 director of our team but worked closely with Mr. Alexander, Mr. Rubin and Mr. Collier in  
23 making strategic decisions. We worked as a team preparing witnesses and evidence and  
24 developing the themes and arguments to be made at trial. Additional firm members were brought  
25 in for specific issues as needed. We held regular team meetings with all members of the team to  
26 discuss strategy, the findings of our focus groups, and to predict the approaches that Tesla would  
27 take. We also used these meetings as opportunities to make assignments for the numerous tasks  
28 involved in the retrial. In terms of the major division of labor for trial. Ms. Nunley, Ms. Hood,

1 and Ms. Durkin from CCRLG and Michael Rubin and Mr. Rosenthal, and other members of his  
2 team from Altshuler, were the primary drafters of motions and oppositions to motions. Because  
3 Mr. Alexander was involved in a trial immediately before the retrial, we shifted work to Mr.  
4 Collier's team who helped prepare examinations and analyze the evidence with their new  
5 perspective. My team again prepared various examinations and prepared new materials for  
6 opening statement. For closing argument, Michael Rubin, Marqui Hood and Susan Organ would  
7 watch or listen to the proceedings and note important information for closing. We also had  
8 numerous people attend trial to give feedback to the trial team. Ms. Organ also prepared the  
9 closing PowerPoint slides in consultation with Mr. Alexander and the team. The final trial team  
10 contained myself, Mr. Alexander, Mr. Collier, Ms. Nunley and Ms. Grislis.

11 50. Plaintiff's counsel has summarized the merit's lodestar in the attached chart  
12 which includes each biller's rate and time and total request. This is attached as Exhibit 1 to my  
13 declaration.

14 51. I should note that some of the time entries may seem relatively short given the  
15 scope of the described tasks. This is because throughout the various litigations my firm has  
16 handled against Tesla, Tesla has raised the same legal arguments. Accordingly, there were some  
17 efficiencies obtained because of this. Conversely, although the facts did not change, the volume  
18 of materials to review, particularly for the retrial was much larger which necessitated more time  
19 reviewing depositions and trial testimony.

20 **MEET AND CONFER WITH TESLA**

21 52. Mr. Rubin and I met with Dan Posner and one of his colleagues on Friday,  
22 October 13, 2023, in an effort to meet and confer about issues raised in the accompanying fees  
23 motion in hopes of eliminating some of the issues the Court might have to analyze in relation to  
24 this motion. That discussion did result in a briefing schedule but no agreement on matters at  
25 issue in this motion. We specifically asked whether Tesla would stipulate either to our hourly  
26 rates or to the reasonableness of the time we were requesting. We informed Tesla of the range of  
27 rates we would be seeking, the approximate lodestar total we would be requesting, and the  
28 various multiplier amounts that we would seek to have applied to different stages of the

1 litigation. We also informed Tesla that if it declined to stipulate to our hourly rates or time, we  
2 would like Tesla to produce its attorneys' rates and time because we believed Tesla's rates and  
3 time would be higher than ours. Mr. Posner stated that he would have to see our motion before  
4 being able to address any of the issues presented in the meet and confer, and declined to produce  
5 Quinn Emmanuel's hourly rates or time records.

#### 6 **BILLING ADJUSTMENTS**

7 53. After the Court entered judgment, I reviewed the time runs of myself and the  
8 attorneys and staff in my firm. I noticed in my review that not all time was captured in the time  
9 records, so these records understate the actual amount of time that was spent on this case. In  
10 situations where work could be construed as duplicative, I endeavored to not bill for duplicative  
11 entries except where they involved work that is collaborative by its very nature such as strategy  
12 meetings or brainstorming meetings with Mr. Alexander, Ms. Nunley, Mr. Rubin and Mr. Collier  
13 among others. I also cut out records for time spent exclusively on Owen Diaz's case against his  
14 staffing agency Citistaff Solutions. I also cut any time spent exclusively on Demetric Di-Az's  
15 case except for entries associated with Demetric's deposition which was important for Owen  
16 Diaz's case, though I did cut some time spent preparing Demetric for his deposition. So, for  
17 example, I cut out 5.6 hours preparing Demetric Di-Az for deposition on April 9, 2018, and May  
18 14, 2018, because those entries related to preparing Mr. Di-Az for deposition but I included the  
19 10.5 hours of time on May 15, 2018, which was spent during the all-day deposition in San  
20 Francisco and the travel time from my office in San Anselmo. I did not include any time spent on  
21 Mr. Patterson's case except the time spent for his deposition and the time spent relative to  
22 potentially calling him as a witness for Mr. Diaz.

23 54. Because Plaintiff's theory of recovery against Tesla depended in part on the  
24 contractual and joint-employer relationship with respect to Mr. Diaz, the discovery that was done  
25 with respect to Citistaff Solutions, West Valley Staffing, and NextSource were important  
26 components relating to the liability of Defendant Tesla. Although I exercised billing discretion  
27 by cutting out time directly related to discovery propounded to Citistaff, West Valley Staffing,  
28 and NextSource, much of the information obtained from or relating to these defendants was

1 material to the case against Tesla. For example, Kevin McGinn was the PMK from NextSource  
2 and he gave critical testimony about the contractual relationship and how Tesla was in control of  
3 the workers once they went to work at the factory. Exhibit 3 at trial was the Master Services  
4 Agreement between NextSource and Tesla and helped show the contract under which Mr. Diaz  
5 was hired. Wayne Jackson was a critical witness who worked for NextSource. The investigation  
6 of Mr. Diaz's complaint about the jigaboo drawing (Trial Exhibits 1 & 2) took place by  
7 Chartwell VP of Human Resources Jacklin Delgado. The notes from her investigation (Trial  
8 Exhibit 287) were the only statement Plaintiff had to cross-examine Ramon Martinez in the first  
9 trial.

10 55. Before the first trial, Plaintiff dismissed several causes of action and did not  
11 oppose the motion for summary adjudication as to the Unruh Claim. The factual components of  
12 these claims overlapped with the factual components of Plaintiff's harassment and failure to  
13 prevent claim. There were no facts that were developed in discovery that were excluded at trial  
14 based on the dismissal of the other causes of action.

15 56. Because of the historical nature of my billing review and the fact that this  
16 litigation has been ongoing for approximately six years, there were some time entries which  
17 included references to discovery related to several defendants. In those situations, I typically cut  
18 the time requests from the total time entered with 50% to 75% reductions depending on the  
19 number of defendants referenced. In this way, I tried to isolate the submitted time runs to only  
20 time related to prosecuting Owen Diaz's case against Tesla.

21 57. Two of my newer associates, Zarrina Ozari and Kira Brekke attended the trials  
22 and provided feedback on the case while we were going through trial. I cut their respective time  
23 even though they did provide some helpful insights. The total hours cut for Ms. Ozari were 9.1  
24 hours of time, and the total hours cut for Ms. Brekke were 67.4 hours. My partner Julianne  
25 Stanford performed various tasks during the trial, but I cut her time entirely as part of the billing  
26 judgments I made.

27 58. Ms. Emily Kohlheim who assisted with the retrial provided important information  
28 for the retrial. A Berkeley Law graduate, Ms. Kohlheim's keen analysis was helpful in analyzing



some of the potential approaches by Tesla's new trial counsel. She also helped analyze information from the focus groups we took to prepare for trial. Ms. Kohlheim attended the retrial in this matter and provided feedback about the conduct of the trial and trial strategy as well as coordinating with witnesses to ensure they were available and ready to testify, but I exercised billing judgment as to that time and cut a total of 53 hours of time from Ms. Kohlheim's total time for trial related hours spent. I also cut approximately 60 hours of time for Ms. Susan Organ on the retrial in exercising billing judgments even though she prepared the opening and closing PowerPoint and participated in team strategy meetings and reviewed the daily transcripts for the retrial and listened to the trial for facts to include in the closing argument.

59. Attached hereto as **Exhibit 2** is a true and correct printout of the time runs as exported to excel and edited to preserve attorney work product for my firm's requested time in this matter through October 23, 2023. These time runs are after billing judgments have been exercised.

60. The total hours that were cut from the time runs in Exhibit 2 is 582.4 hours. These hours were cut either because they appeared to be duplicative, irrelevant to the case that was tried, or because I exercised billing judgments as I would do for paying clients. So for example, I cut 69.7 hours of my time and 241.7 hours of Ms. Nunley's time. These reductions amount to about 9.96 percent of the total time worked by my firm members on the *Diaz* case.

61. The total lodestar without enhancement for my firm is as follows:

Attorney/Staff	Hourly Rate	Hours Spent	Total
Lawrence A. Organ	\$975	2356.4	\$2,368,372.50
Marqui Hood	\$900	128	\$115,200
Molly Durkin	\$750	46.2	\$32,340
Cimone Nunley	\$500	1518.7	\$10,890
Navruz Avloni	\$725	449	\$325,525
Emily Kohlheim	\$425	75.4	\$32,045
Noah Baron	\$600	21	\$12,600

CCRLG Law Clerks and Paralegals	\$225	740	\$166,500
<b>TOTAL</b>			<b>\$3,811,932.50</b>

62. Attached as **Exhibit 3** is a true and correct copy a spreadsheet detailing everyone's time with a multiplier applied to the different time periods of the case. So for the work on the first trial through October 5, 2021, Plaintiff seeks a 2.0 multiplier for the 3,271.3 hours that CCRLG timekeepers worked on the case up to that point. For the period from October 6, 2021 until February 6, 2022, Plaintiff seeks a 1.5 multiplier for the 469.8 hours that CCRLG timekeepers worked during that time period. For all time after that except the Fees on Fees work, Plaintiff seeks a 1.2 multiplier on the 1728.7 hours CCRLG spent on the retrial. We are not seeking a multiplier on the 151 hours of work for Fees on Fees work related to the case. Accordingly, we pulled out the time spent on fees on fees work out of the multiplier spreadsheet and then added it back in the last columns next to the totals. This way no multiplier was applied to fees on fees work.

### **CASE EXPENSES**

63. In addition to the significant number of hours that my firm worked on this case, we also Plaintiff Owen Diaz also incurred expenses of approximately \$187,145.24 that were advanced by my firm and partly by Mr. Alexander's firm because Mr. Diaz had insufficient financial resources to pay for litigation expenses. Plaintiff seeks reimbursement of those expenses reasonable and necessary for the litigation of this case. Some of these expenses such as expert fees are specifically permitted to a prevailing plaintiff in a civil rights action under 42 U.S.C. §1988. Other expenses are typical to trials such as use of juror consultants which both parties used at least in the first trial. My firm primarily advanced these expenses, but my co-counsel also incurred expenses related trying the case.

64. Plaintiff's expenses incurred by my firm are detailed in the attached printout from MyCase showing the costs. (See **Exhibit 4**.) Some of the costs, \$61,865.50 were part of the Bills of Costs associated with the first and second trial. These costs are not included in the current

1 request as they have already been awarded by the Court. Therefore, the expenses detailed here  
 2 are only for expenses that were reasonably incurred by my firm but which have not been  
 3 determined by the Court.

4 65. For the Court's convenience, Plaintiff has also prepared a consolidated costs  
 5 spreadsheet (See **Exhibit 6**) so that the Court can review all costs incurred by my firm as well as  
 6 Altshuler Berson and Mr. Alexander's firm. Mr. Collier's firm did not submit any reimbursement  
 7 for expenses in conjunction with his fee declaration.

8 66. Plaintiff retained five experts over the course of the litigation. Plaintiff initially  
 9 retained Dr. Bruce Smith to evaluate the psychological impact of the race harassment on Owen  
 10 Diaz and Demetric Di-Az for the mediation that was scheduled with Tesla in 2018. Plaintiff  
 11 spent \$9,205 on this evaluation but this was for both clients, so Plaintiff is only claiming half or  
 12 \$4,602.50 for Mr. Owen Diaz. Plaintiff also retained Michael Robbins to provide his opinions  
 13 regarding Tesla's HR policies and practices. His opinions were helpful in guiding some of the  
 14 discovery in the case. His expert services cost \$10,500. Neither Dr. Smith nor Mr. Robbins were  
 15 available for trial. Accordingly, Plaintiff retained new experts for trial. We hired Amy  
 16 Oppenheimer to provide expert opinions on Tesla's HR and investigation policies. She testified  
 17 at both the original trial and the retrial. Her testimony highlighted the failure by Tesla to take  
 18 adequate steps to prevent the harassment from occurring and its reprehensible conduct in doing  
 19 so. The total costs for Amy Oppenheimer were \$41,106.00. (See **Exhibit 7** for true and correct  
 20 copies of her bills.) Dr. Anthony Reading was retained to opine on Owen Diaz's emotional  
 21 distress damages and the nature of emotional distress damages in race harassment cases. Dr.  
 22 Reading testified at both trials and his costs were split between my firm and Mr. Alexander's  
 23 firm. The total costs for Dr. Anthony Reading were \$28,224.00. (See **Exhibit 8** for true and  
 24 correct copies of his bills which do not include the \$5,000 retainer that was paid.) In addition,  
 25 Plaintiff hired expert economist Dr. Charles Mahla to opine on Tesla's financial condition.  
 26 Plaintiff sought a stipulation on this issue, but Tesla refused so Dr. Mahla's testimony was  
 27 needed for punitive damages purposes. Dr. Mahla testified in both trials. The total costs for Dr.  
 28 Mahla were \$24,614.15. (See **Exhibit 9** for true and correct copies of his bills.) The total costs

1 for the experts who testified at trial was \$93,944.15 and for the pretrial experts was \$15,102.50  
2 for a **total cost for Plaintiff's experts of \$109,046.70.**

3 67. Plaintiff also retained jury consultant Harry Plotkin to assist with trial strategy and  
4 jury selection. Race harassment cases are particularly difficult to prove, and I have found that  
5 jury consultants such as Mr. Plotkin – who is recognized as one of the best in California – are  
6 adept at helping simplify difficult cases such as the instant one where Mr. Diaz was employed  
7 through a staffing company. Mr. Plotkin assisted counsel with focus group research, trial strategy  
8 and jury selection at both trials. He helped design the juror questions and assisted Mr. Alexander  
9 with jury selection. Plaintiff notes that Ms. Kennedy used a jury consultant in the first trial, but  
10 we are unaware whether Tesla used one in the second trial. Based on my knowledge and  
11 experience, it is typical for the community of plaintiff's employment civil rights lawyers and in  
12 the various cases that I have tried over the years to bill a jury consultant's work separately as  
13 opposed to including it in overhead. **Mr. Plotkin's total costs for both trials were \$29,130.93.**  
14 (See **Exhibit 10** for true and correct copies of his bills.)

15 68. Several of the attorneys in my firm do not work out of our Bay Area offices.  
16 Cimone Nunley works remotely from Sacramento. Marqui Hood works remotely from Los  
17 Angeles. Accordingly, we seek travel expenses and accommodation for Ms. Nunley for both the  
18 2021 trial and the 2023 trial. We also are requesting travel expenses and accommodation for Ms.  
19 Hood for the 2023 trial. Prior to Ms. Hood joining my firm, I was required to travel to Los  
20 Angeles to take the deposition of key HR witness Erin Marconi, so this request for expenses  
21 includes that travel expense. In addition, we have requested various other travel expenses such as  
22 travel and meal expenses related to taking or defending depositions in the case. These travel  
23 expenses are all the types of travel expenses that law firms typically charge to their hourly  
24 paying clients. The total travel expenses for which CCRLG seeks reimbursement is \$9,843.80.

25 69. Plaintiff seeks reimbursement for postage and delivery expenses that were not  
26 part of the Bills of Costs that have already been submitted to the Court. These postage and  
27 delivery costs total \$2,099.78.  
28

1           70. Plaintiff seeks reimbursement for miscellaneous expenses relating to preparing  
2 for trial and litigating the case. These expenses include investigation costs with Stu Kohler who  
3 is a private investigator who helps find witnesses. A mediation expense for Jeff Ross in the  
4 amount of \$1,800. These miscellaneous expenses include costs related to focus groups which  
5 included one focus group organized by our jury consultant Harry Plotkin and several other focus  
6 groups organized by my firm. These focus group expenses include the ads to recruit participants  
7 and payments to the focus group participants. In addition, these expenses include expenses for  
8 trial related materials like exhibit tabs and dividers, demonstrative exhibits, and ordering  
9 duplicate original transcripts for use during the retrial. These miscellaneous expenses are detailed  
10 in Exhibit 4 and total \$18,586.66.

11  
12           I declare under penalty of perjury under the laws of the United States of America that the  
13 foregoing is true and correct based on my knowledge and belief. Executed October 25, 2023, in  
14 San Anselmo, California.

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Lawrence A. Organ

# Exhibit 1

<b>EXHIBIT 1: BASE LODESTAR WITHOUT MULTIPLIERS</b>				
<b>Attorney/Staff</b>	<b>Year</b>	<b>Rate</b>	<b>Hours</b>	<b>Lodestar</b>
<u>Altshuler Berzon</u>				
Michael Rubin	1977	\$1275	496.6	\$633,165.00
Jonathan Rosenthal	2019	\$650	614.65	\$399,522.50
Corrine Johnson	2012	\$825	196.4	\$162,030.00
Sam Hull	2022	\$550	15.7	\$8,635.00
Altshuler Berzon Law Clerks and Paralegals	N/A	\$325/350	91.2	\$29,661.00
<u>Alexander, Morrison, &amp; Fehr</u>				
Bernard Alexander	1986	\$1200	967.6	\$1,161,120.00
Britt Karp	2011	\$675	39	\$26,325.00
Natalie Khoury	2021	\$350	49.9	\$17,465.00
Gus Ham (Paralegal)	N/A	\$225	48.4	\$10,890.00
<u>California Civil Rights Law Group</u>				
Lawrence Organ	1994	\$975	2356.4	\$2,368,372.50
Marqui Hood	2001	\$900	128	\$115,200.00
Molly Durkin	2006	\$750	46.2	\$32,340.00
Navruz Avloni	2011	\$725	449	\$325,525
Cimone Nunley	2018	\$500	1518.7	\$759,350.00
Emily Kohlheim	2021	\$425	75.4	\$32,045.00
Noah Baron	2015	\$600	21	\$12,600
CCRLG Law Clerks/Paralegals	N/A	\$225	740	\$166,500
<u>Collier Law Firm</u>				
Dustin Collier	2009	\$750	272.93	\$204,697.50
V. Joshua Socks	2012	\$700	83.1	\$58,170.00
Drew Teti	2009	\$550	40.9	\$22,495.00
Elizabeth Malay	2013	\$400	187.4	\$74,960.00



# Exhibit 2

Date	User	Activity	Time	Description
2/27/2018	Navruz Avloni	Communication	0.3	Meet with Larry Organ regarding Case Management Conference, General Order no. 71 per the Judge's orders; determine scope of discovery.
4/5/2018	Navruz Avloni	Review/ Analyze	0.1	Saved Defendants Citistaff's and Tesla's initial disclosures in original format using site link.
4/5/2018	Navruz Avloni	Review/ Analyze	0.1	Checked Defendant West Valley's email of initial disclosures.
4/6/2018	Navruz Avloni	Draft/ Revise	0.2	Revised stipulation to continue mediation per Barbara Antonucci's edits. Email to/from counsel regarding mediation stipulation.
4/9/2018	Navruz Avloni	Communication	0.2	Meeting with Demetric Di-az regarding his deposition
4/10/2018	Navruz Avloni	Review/ Analyze	0.1	Reviewed the notice of unavailability of Barbara Antonucci, save to Dropbox
4/10/2018	Navruz Avloni	Other	0.2	Communication with client.
4/10/2018	Navruz Avloni	File/ Serve	0.1	Filed mediation stipulation.
4/11/2018	Navruz Avloni	Other	0.2	Clarified information with client
4/11/2018	Navruz Avloni	Review/ Analyze	0.1	Reviewed Judge Orrick's order regarding the stipulation to continue the mediation, save to Dropbox
4/12/2018	Navruz Avloni	Communication	0.1	Email to/from clients regarding CONFIDENTIAL STUFF.
4/16/2018	Navruz Avloni	Communication	0.1	Telephone call with Demetric Di-az regarding his deposition
5/1/2018	Navruz Avloni	Draft/ Revise	1.5	Draft the deposition notice of Defendant Tesla's person most knowledgeable.
5/1/2018	Navruz Avloni	Communication	0.2	Strategy discussion with Larry Organ regarding Defendant Tesla's person most knowledgeable.
5/1/2018	Navruz Avloni	Communication	0.1	Email to/from the mediator regarding case status.
5/2/2018	Navruz Avloni	Review/ Analyze	0.1	Reviewed orders from ADR, calendaring briefing schedule for mediation brief.
5/2/2018	Navruz Avloni	Communication	0.3	Communication regarding settlement with Larry Organ
5/2/2018	Navruz Avloni	Communication	0.1	Telephone call with Owen Diaz regarding settlement.
5/2/2018	Navruz Avloni	Communication	0.1	Telephone call with Demetric Di-az regarding settlement.
5/2/2018	Navruz Avloni	Communication	0.1	Reviewed email from mediator regarding briefing.
5/2/2018	Navruz Avloni	Communication	0.1	Email to opposing counsel with our initial settlement amount.
5/2/2018	Navruz Avloni	Communication	0.3	Email exchange with opposing counsel regarding separate demands. Discussion with Larry Organ, telephone call with Owen Diaz regarding demand amount.

Date	User	Activity	Time	Description
5/2/2018	Navruz Avloni	Meet	0.3	Meet with Larry Organ and Cimone Nunley regarding settlement issues
5/3/2018	Navruz Avloni	Plan/ Prepare	0.1	Telephone call with client Owen Diaz regarding discovery responses; email to Cimone Nunley.
5/4/2018	Navruz Avloni	Draft/ Revise	0.2	Amend the Rule 30 deposition notice (Defendant Tesla's person most knowledgeable).
5/7/2018	Navruz Avloni	Communication	0.1	Email to client Owen Diaz regarding deposition prep and requested documents.
5/9/2018	Navruz Avloni	Communication	0.1	Telephone call with client Owen Diaz regarding deposition prep.
5/10/2018	Navruz Avloni	Plan/ Prepare	3.5	Meet with client Owen Diaz to prepare for his deposition
5/10/2018	Navruz Avloni	Communication	0.3	Meet with Larry Organ prior to meeting with Owen Diaz regarding deposition prep
5/14/2018	Navruz Avloni	Communication	0.1	Discussion with Owen Diaz re CONFIDENTIAL stuff.
5/14/2018	Navruz Avloni	Review/ Analyze	0.1	Review email to client Owen Diaz with relevant docs
5/14/2018	Navruz Avloni	Communication	0.1	Email exchange with mediator regarding starting demand amount.
5/15/2018	Navruz Avloni	Appearance/ Attend	8	travel to/from deposition; attend deposition of Demetric Di-az
5/15/2018	Navruz Avloni	Communication	0.1	Email to Dr. Bruce Smith regarding doing expert psychiatric evaluations of clients Owen Diaz and Demetric Di-az
5/17/2018	Navruz Avloni	Communication	0.1	Telephone call with client Demetric Di-az confirming his appointment with Dr. Smith. Sent emails and texts to clients with their appointment information.
5/17/2018	Navruz Avloni	Plan/ Prepare	0.2	Prepared for meeting with Owen Diaz for his deposition prep.
5/17/2018	Navruz Avloni	Meet	3.3	Meet with client Owen Diaz to prepare him for his deposition.
5/17/2018	Navruz Avloni	Communication	0.2	Email to Dr. Smith with details regarding consult.
5/18/2018	Navruz Avloni	Draft/ Revise	3.9	Revise client Owen Diaz's responses to Defendant Tesla's request for production of documents, set one and Defendant Citistaff's request for production of documents, set one.
5/20/2018	Navruz Avloni	Communication	0.1	Discussion with Larry Organ regarding mediation strategy.
5/20/2018	Navruz Avloni	Communication	0.1	Email to Ramzi Nimr regarding subpoenas.
5/20/2018	Navruz Avloni	Communication	0.1	Email exchange with Plaintiff Owen Diaz regarding verifications.
5/20/2018	Navruz Avloni	Communication	0.1	Discussion with Larry Organ regarding new documents produced by Defendants Tesla and Citistaff.
5/20/2018	Navruz Avloni	Communication	0.1	Discussion with Larry Organ regarding settlement numbers.

Date	User	Activity	Time	Description
5/20/2018	Navruz Avloni	Draft/ Revise	0.1	Added notes from Demetric Di-az's deposition.
5/20/2018	Navruz Avloni	Review/ Analyze	0.1	Reviewed the PACER docket for details on the mediation
5/20/2018	Navruz Avloni	Communication	0.2	Telephone call with Plaintiff Owen Diaz regarding setting a meeting, deposition, and newly produced documents.
5/20/2018	Navruz Avloni	Meet	0.1	Meet with Larry Organ to discuss the deposition of Owen Diaz
5/21/2018	Navruz Avloni	Review/ Analyze	0.6	Review Defendant Tesla's new document production bates labeled TESLA 308-411
5/21/2018	Navruz Avloni	Communication	0.2	Communication with Larry Organ regarding Plaintiff Owen Diaz's deposition.
5/21/2018	Navruz Avloni	Communication	0.1	Email to/from expert Dr. Smith.
5/21/2018	Navruz Avloni	Plan/ Prepare	0.5	Phone conversation with Plaintiff Owen Diaz regarding deposition preparation.
5/21/2018	Navruz Avloni	Draft/ Revise	0.4	Prepared additional documents for production.
5/22/2018	Navruz Avloni	Appearance/ Attend	8	Attended the deposition of Plaintiff Owen Diaz with Larry Organ, and travel to/from.
5/22/2018	Navruz Avloni	Other	0.1	Saved all new documents from client Owen Diaz to DropBox, email to Noah Baron with instructions for document preparation.
5/22/2018	Navruz Avloni	Communication	0.1	Email to opposing counsel with supplemental document production
5/23/2018	Navruz Avloni	Communication	0.1	Discussion regarding Owen Diaz being late to his appointment with Dr. Smith.
5/29/2018	Navruz Avloni	Communication	0.1	Email exchange with expert Dr. Smith.
5/30/2018	Navruz Avloni	Other	0.1	Downloaded deposition transcripts of Plaintiff Owen Diaz and Demetric Di-az.
5/30/2018	Navruz Avloni	Communication	0.1	Email to expert Dr. Smith with deposition transcripts.
5/30/2018	Navruz Avloni	Communication	0.4	Email exchange with opposing counsel, reviewed notice, discussion with Larry Organ regarding deposition strategy.
5/30/2018	Navruz Avloni	Other	0.1	Organized the exhibits from Owen Diaz deposition.
5/31/2018	Navruz Avloni	Draft/ Revise	0.3	Prepared the deposition subpoena of Rovilla Wettle, email exchange with process server Rob Goodstein.
5/31/2018	Navruz Avloni	Draft/ Revise	0.2	Reviewed the email from counsel for Defendant Tesla regarding the person most knowledgeable deposition; respond to counsel with Plaintiffs' position.
6/1/2018	Navruz Avloni	Communication	0.1	Send email to Bridget Mattos regarding reserving court reporters for witness depositions.
6/1/2018	Navruz Avloni	Communication	0.1	Email exchange with opposing counsel for Defendant Tesla regarding the person most knowledgeable deposition.

Date	User	Activity	Time	Description
6/1/2018	Navruz Avloni	Communication	0.3	Telephone call with counsel for Defendant Tesla regarding depositions with Larry Organ
6/1/2018	Navruz Avloni	Communication	0.3	Discussion with Larry Organ regarding strategy for Defendant Tesla's person most knowledgeable deposition.
6/1/2018	Navruz Avloni	Communication	0.1	Email to opposing counsel for all defendants regarding the status of next week's depositions.
6/1/2018	Navruz Avloni	Communication	0.1	Phone call with counsel for Defendant West Valley regarding the deposition status of Rovila Wetle's deposition.
6/1/2018	Navruz Avloni	Review/ Analyze	0.1	Reviewed proofs of personal service from process server Rob Goodstein for service of Rovila Wetle's deposition notice; saved information.
6/1/2018	Navruz Avloni	Draft/ Revise	0.6	Drafted list of topics for Defendant Tesla's person most knowledgeable deposition, as they pertain to each witness that is being produced; prepared time estimates; email to counsel for Defendant Tesla regarding proposed schedule for witnesses and breakdown of topics.
6/1/2018	Navruz Avloni	Communication	0.1	Discussion with Larry Organ regarding mediation brief submission, email to mediator.
6/1/2018	Navruz Avloni	Communication	0.1	Email exchange with counsel for Defendant Tesla regarding the person most knowledgeable deposition.
6/1/2018	Navruz Avloni	Draft/ Revise	0.4	Draft mediation brief
6/1/2018	Navruz Avloni	Draft/ Revise	0.4	Analyzed facts for mediation brief
6/1/2018	Navruz Avloni	Meet	0.3	Meet with Larry Organ to discuss person most knowledgeable topics for Defendant Tesla
6/4/2018	Navruz Avloni	Review/ Analyze	0.1	Reviewed psychological evaluation report for Owen Diaz from expert Dr. Smith.
6/4/2018	Navruz Avloni	Draft/ Revise	1	Draft mediation brief sections: conclusion, settlement, damages.
6/4/2018	Navruz Avloni	Communication	0.1	Email exchange with Kris Organ regarding summary of case costs.
6/4/2018	Navruz Avloni	Communication	0.1	Communication with counsels regarding pushing the deposition of Rovila Wetle to a later start time.
6/4/2018	Navruz Avloni	Draft/ Revise	9	Draft mediation brief; discussed strategy with Larry Organ; prepared exhibits; email to mediator with brief; printed copies for co-counsel.
6/4/2018	Navruz Avloni	Communication	0.1	Email to expert Dr. Smith regarding reports on clients.
6/4/2018	Navruz Avloni	Plan/ Prepare	5	Prepared for Rovila Wetle deposition by reviewing documents, discovery produced. Print exhibits for use in deposition and created deposition outline.
6/4/2018	Navruz Avloni	Meet	0.3	Meet with Larry Organ to discuss mediation issues and strategy
6/5/2018	Navruz Avloni	Plan/ Prepare	1.1	Finished drafting the deposition outline of Rovila Wetle.

Date	User	Activity	Time	Description
6/5/2018	Navruz Avloni	Appearance/ Attend	7	Appear for and take the deposition of Rovilla Wetle. Larry Organ finished taking the deposition.
6/6/2018	Navruz Avloni	Review/ Analyze	0.2	Reviewed the psychiatric reports of clients.
6/6/2018	Navruz Avloni	Communication	0.3	Phone meeting with expert Dr. Smith.
6/6/2018	Navruz Avloni	Communication	0.4	Discussion with Larry Organ regarding strategy for depositions; reviewed video.
6/6/2018	Navruz Avloni	Communication	0.1	Email to opposing counsel for Defendants Tesla and Citistaff regarding mediation brief.
6/6/2018	Navruz Avloni	Plan/ Prepare	2.9	Prepared for the depositions of Javier Caballero and Victor Quintero by preparing and reviewing documents, reviewing discovery; conducted a mini investigation. Pulled the relevant research and outline notes.
6/11/2018	Navruz Avloni	Appearance/ Attend	6.5	Appear at mediation, travel to and from.
6/12/2018	Navruz Avloni	Meet	0.3	Meet with Ramzi Nimr regarding documents.
6/13/2018	Navruz Avloni	Communication	0.2	Email exchange with counsel for Defendant Tesla regarding the confidentiality of the person most knowledgeable deposition; discussion with court reporter regarding this.
6/13/2018	Navruz Avloni	Review/ Analyze	0.2	Began looking into protective order issue.
6/13/2018	Navruz Avloni	Communication	0.1	Email exchange with Larry Organ regarding designations.
6/14/2018	Navruz Avloni	Communication	0.1	Email to/from opposing counsels regarding the protective order.
6/14/2018	Navruz Avloni	Communication	0.2	Discussed expert Dr. Smith with Larry Organ and next steps.
6/15/2018	Navruz Avloni	Communication	0.1	Discussion with Larry Organ regarding confidential designations; email exchange with Kathy Golec of Bridget Mattos and Associates.
6/18/2018	Navruz Avloni	Other	0.1	Saved the proposed stipulation regarding the protective order to Dropbox.
6/19/2018	Navruz Avloni	Review/ Analyze	0.1	Reviewed email and saved Rovilla Wetle designations.
6/20/2018	Navruz Avloni	Review/ Analyze	0.1	Reviewed Rovila Wetle deposition changes, saved information to Dropbox.
6/22/2018	Navruz Avloni	Communication	0.1	Email exchange with Larry Organ regarding Diaz objections to designations; and the Rovila Wetle deposition.
6/25/2018	Navruz Avloni	Review/ Analyze	0.1	Review notes prepared by Ramzi Nimr regarding outstanding discovery.
6/28/2018	Navruz Avloni	Communication	0.1	Discussed strategy with Ramzi Nimr.
7/3/2018	Navruz Avloni	Meet	0.1	Team meeting to discuss discovery and strategy.

Date	User	Activity	Time	Description
7/3/2018	Navruz Avloni	Draft/ Revise	0.9	Draft the witness list; reviewed relevant documents and initial disclosures for witnesses.
8/23/2018	Navruz Avloni	Review/ Analyze	0.1	Reviewed upcoming deadlines, email to Larry Organ regarding the upcoming Case Management Statement.
8/24/2018	Navruz Avloni	Communication	0.1	Email to Sabrina Grislis regarding calling the clerk to set up remote appearance for Case Management Statement.
8/27/2018	Navruz Avloni	Draft/ Revise	0.7	Drafted Case Management Statement; email to opposing counsel regarding deadline. Reviewed file.
8/27/2018	Navruz Avloni	Meet	0.2	Discussed case strategy with Larry Organ.
8/27/2018	Navruz Avloni	Draft/ Revise	0.2	Further revised Case Management Statement; email to opposing counsel.
9/3/2018	Navruz Avloni	Communication	0.2	Discussed with Larry Organ whether we should add nextSource and Chartwell as defendants.
9/4/2018	Navruz Avloni	Travel Expense	1.2	Travel to and from Case Management Hearing in San Francisco.
9/4/2018	Navruz Avloni	Appearance/ Attend	0.3	Appear before Judge Orrick for the Case Management Conference.
9/4/2018	Navruz Avloni	Plan/ Prepare	0.2	Prepared for Case Management Conference hearing.
9/5/2018	Navruz Avloni	Review/ Analyze	0.1	Reviewed minutes order from today's Case Management Hearing; save to file.
9/5/2018	Navruz Avloni	Communication	0.1	Discussion with Cimone Nunley regarding the witness list, discovery requests.
9/7/2018	Navruz Avloni	Communication	0.3	Send email to Defense counsel regarding setting depositions; reviewed witness list; reviewed current calendar availability.
9/7/2018	Navruz Avloni	Meet	0.2	Meet with Cimone Nunley regarding depositions to take
9/7/2018	Navruz Avloni	Meet	0.3	Meet with Larry Organ and Cimone Nunley to review the list of individuals to depose in case
9/18/2018	Navruz Avloni	Communication	0.1	Email exchange with with Defense counsel for West Valley regarding the person most knowledgeable deposition.
9/19/2018	Navruz Avloni	Communication	0.1	Email exchange with Cimone Nunley regarding mediation.
9/26/2018	Navruz Avloni	Communication	0.1	Email exchange with mediator regarding start time of mediation, saved and calendared information related to mediation.
10/8/2018	Navruz Avloni	Draft/ Revise	6	Drafted second mediation brief. Reviewed evidence.
10/9/2018	Navruz Avloni	Draft/ Revise	0.5	Revised mediation brief.
10/9/2018	Navruz Avloni	Meet	0.1	Meet with Larry Organ regarding his edits to mediation brief
10/16/2018	Navruz Avloni	Appearance/ Attend	6.5	Attended mediation.
10/16/2018	Navruz Avloni	Communication	0.1	Call with Cimone Nunley regarding failure to prevent and 1981

Date	User	Activity	Time	Description
10/16/2018	Navruz Avloni	Communication	0.1	Call with Larry Organ regarding mediation and next steps
10/30/2018	Navruz Avloni	Communication	0.2	Meet with Noah Baron to discuss process for notifying Wheels of Justice and employers regarding Plaintiff Owen Diaz's notice of objections to subpoena.
10/30/2018	Navruz Avloni	Communication	0.1	Communication with Larry Organ regarding meet and confer requirement
10/30/2018	Navruz Avloni	Communication	0.1	Telephone conference with Larry Organ regarding discovery
11/6/2018	Navruz Avloni	Communication	0.1	Telephone call with Owen Diaz; telephone call with Demetric Diaz.
11/8/2018	Navruz Avloni	Communication	0.1	Reviewed depositions with Cimone Nunley in preparation for tomorrow's call with opposing counsel to schedule depositions.
11/9/2018	Navruz Avloni	Communication	0.1	Telephone conference with Larry Organ regarding depositions of Defendants' West Valley and Citistaff Persons Most Knowledgeable.
11/9/2018	Navruz Avloni	Communication	0.1	Telephone conference with Larry Organ regarding his call with Opposing Counsel
11/14/2018	Navruz Avloni	Draft/ Revise	0.3	Email to/from opposing counsel regarding depositions; calendared depositions; send instructions to Sabrina Grislis regarding preparing notices/subpoenas, and to Cimone Nunley.
11/14/2018	Navruz Avloni	Draft/ Revise	0.3	Created witness chart
11/14/2018	Navruz Avloni	Research	0.3	Research witnesses; emails regarding depositions.
11/15/2018	Navruz Avloni	Communication	0.1	Email to/from opposing counsels regarding depositions.
11/16/2018	Navruz Avloni	Communication	0.2	Email to/from opposing counsels regarding depositions; instructions to Sabrina Grislis regarding preparing deposition notices.
11/16/2018	Navruz Avloni	Research	0.4	Researched finding Rothaj Foster and Wayne Jackson.
11/16/2018	Navruz Avloni	Communication	0.2	Further communication regarding locating witnesses, background search, etc.
11/16/2018	Navruz Avloni	Review/ Analyze	0.2	Reviewed and signed the deposition notices and subpoenas for Ramon Martinez, Wayne Jackson, and Rothaj Foster.
11/17/2018	Navruz Avloni	Communication	0.1	Email to/from Tesla counsel regarding Defendant Tesla's person most knowledgeable deposition
11/19/2018	Navruz Avloni	Communication	0.1	Email exchange regarding Defendant Tesla's person most knowledgeable deposition.
11/19/2018	Navruz Avloni	Communication	0.1	Send email regarding upcoming depositions.
11/19/2018	Navruz Avloni	Communication	0.1	Email to clients regarding scheduling deposition preparation meetings; check calendaring of meetings and depositions.
11/19/2018	Navruz Avloni	Other	0.1	Reviewed notes for outstanding items to complete.



Date	User	Activity	Time	Description
11/19/2018	Navruz Avloni	Review/ Analyze	0.2	Reviewed and signed the person most knowledge deposition notices. Email to Sabrina Grislis for service.
11/20/2018	Navruz Avloni	Communication	0.1	Email exchange with Tesla counsel regarding Ramon Martinez.
11/20/2018	Navruz Avloni	Communication	0.1	Email exchange with process server Rob Goodstein regarding service on Wayne Jackson and Rothaj Foster.
11/21/2018	Navruz Avloni	Communication	0.3	Call with Wayne Jackson regarding the deposition subpoena subpoena, hardship, service address, etc.
11/21/2018	Navruz Avloni	Communication	0.1	Left a voicemail for Defendants Tesla and Citistaff's counsel Aaron Rutchman regarding the subpoenas they issued.
11/21/2018	Navruz Avloni	Communication	0.2	Email to team regarding outstanding tasks.
11/21/2018	Navruz Avloni	Communication	0.1	Email to/from team regarding RPDs.
11/26/2018	Navruz Avloni	Communication	0.2	Discussion with Larry Organ regarding discovery
11/26/2018	Navruz Avloni	Communication	0.1	Email to team regarding discovery
11/26/2018	Navruz Avloni	Communication	0.3	Email to private investigator regarding Ramon Martinez location. Researched witness online.
11/26/2018	Navruz Avloni	Communication	0.1	Email to opposing counsels regarding harasser Ramon Martinez.
12/3/2018	Navruz Avloni	Communication	0.3	Discussed Ramon Martinez, Rothaj Foster, and Wayne Jackson depositions with Larry Organ.
12/3/2018	Navruz Avloni	Communication	0.1	Email exchange with opposing counsel regarding Rothaj Foster and Wayne Jackson depositions.
12/4/2018	Navruz Avloni	Appearance/ Attend	2.7	Defended client Demetric Di-az's deposition (1.5); travel to and from San Francisco location (1.2).
12/4/2018	Navruz Avloni	Meet	1.8	Case strategy meeting with Larry Organ and Cimone Nunley.
12/5/2018	Navruz Avloni	Meet	1.5	Team strategy meeting with Larry Organ and Cimone Nunley
12/5/2018	Navruz Avloni	Plan/ Prepare	3	Prepared for the deposition of Monica Deleon: reviewed exhibits, revised outline.
12/5/2018	Navruz Avloni	Meet	0.5	Further case strategy meeting with Larry Organ and Cimone Nunley
12/6/2018	Navruz Avloni	Appearance/ Attend	9.3	Took the deposition of Monica Deleon (7.5); travel to and from Oakland office (1.8)
12/6/2018	Navruz Avloni	Plan/ Prepare	1	Finished prepping for the Monica Deleon deposition.
12/10/2018	Navruz Avloni	Meet	0.6	Meet with Larry Organ, Noah Baron, and Cimone Nunley regarding case strategy of whether or not to add nextSource as a defendant
12/10/2018	Navruz Avloni	Communication	0.1	Email exchange with court reporter Bridget Mattos and Associates about the deposition of Wayne Jackson
12/10/2018	Navruz Avloni	Meet	0.2	Meet with Larry Organ and Noah Baron regarding West Valley PMK deposition prep

Date	User	Activity	Time	Description
12/10/2018	Navruz Avloni	Review/ Analyze	0.1	Reviewed Plaintiffs' discovery responses.
12/10/2018	Navruz Avloni	Draft/ Revise	1.4	Reviewed the stipulation to move deadlines; drafted the stipulation to amend and continue trial; researched local rules and Judge Orrick's rules, etc.
12/10/2018	Navruz Avloni	Meet	0.1	Meet with Larry Organ only to discuss the West Valley PMK deposition
12/11/2018	Navruz Avloni	Communication	0.1	Email exchange with opposing counsel regarding the deposition of Wayne Jackson.
12/11/2018	Navruz Avloni	Communication	0.1	Email to Wayne Jackson's representative Emily regarding his deposition.
12/11/2018	Navruz Avloni	Review/ Analyze	0.1	Reviewed subpoena to nextSource, calendared production deadline
12/13/2018	Navruz Avloni	Communication	0.1	Telephone call with Helene Simvoulakis, counsel for West Valley, regarding the stipulation to amend the complaint and continue trial; email to Aaron Rutchman and Barbara Antonucci, counsel for Tesla and Citistaff, calls to Aaron and Barbara (no answer).
12/13/2018	Navruz Avloni	Communication	0.1	Email exchange with court reporter regarding spelling for reporter's transcript
12/13/2018	Navruz Avloni	Communication	0.1	Phone call with Larry Organ regarding amending the complaint
12/14/2018	Navruz Avloni	Review/ Analyze	0.1	Reviewed the revised stipulation to continue trial and amend the complaint; email exchange with opposing counsel regarding filing the stipulation.
12/14/2018	Navruz Avloni	Draft/ Revise	0.2	Finalized the stipulation to continue trial and amend the complaint; added electronic signatures; finalized the amended complaint; email to Sabrina Grisli with instructions for filing.
12/17/2018	Navruz Avloni	Communication	0.1	Email exchange with Rob Goodstein regarding service on Ramon Martinez.
12/18/2018	Navruz Avloni	Communication	0.1	Email exchange with counsel for Tesla and Citistaff Barbara Antonucci regarding the proposed order.
12/18/2018	Navruz Avloni	Communication	0.1	Email to Judge Orrick's clerk with the proposed order for the stipulation to amend the complaint and continue the trial.
12/20/2018	Navruz Avloni	Communication	0.1	Discussed the case with Cimone Nunley.
12/20/2018	Navruz Avloni	Draft/ Revise	0.5	Prepared, reviewed, and revised Owen Diaz's and Demetric Diaz's discovery responses
12/24/2018	Navruz Avloni	Other	0.1	Saved verification, instruction regarding service.
12/24/2018	Navruz Avloni	Review/ Analyze	0.1	Reviewed Defendant Tesla's substitution of counsel filing
12/24/2018	Navruz Avloni	Communication	0.1	Reviewed emails regarding deposition scheduling; reviewed the calendar to confirm events taken off.
12/24/2018	Navruz Avloni	Review/ Analyze	0.3	Reviewed nextSource, Inc's objection to subpoena (.2); discussion with Larry Organ (.1)
12/24/2018	Navruz Avloni	Communication	0.1	Email to nextSource regarding subpoena

Date	User	Activity	Time	Description
12/24/2018	Navruz Avloni	Communication	0.1	Email to team regarding filing the amended complaint.
12/24/2018	Navruz Avloni	Review/ Analyze	0.1	Reviewed the signed order regarding the new trial date
12/26/2018	Navruz Avloni	Communication	0.1	Email to Emily Mack regarding service of the amended complaint.
1/2/2019	Navruz Avloni	Communication	0.2	Discuss witness information with Larry Organ
1/2/2019	Navruz Avloni	Communication	0.5	Communication with Larry Organ regarding expert strategy; call with Michael Robbins; research Scott; email to Robbins with documents requested.
1/2/2019	Navruz Avloni	Other	0.3	Researched possible experts to retain.
1/2/2019	Navruz Avloni	Meet	0.3	Discussed depositions with Larry Organ.
1/2/2019	Navruz Avloni	Communication	0.1	Reviewed email from Defendant Chartwell's counsel regarding the stipulation granting Defendant nextSource's extension of time to answer the complaint and filing.
1/2/2019	Navruz Avloni	Communication	0.1	Text exchange with Larry Organ regarding Defendant Tesla's PMK deposition notice topics; saved information.
1/2/2019	Navruz Avloni	Communication	0.2	Reviewed Defendant Tesla's RPD discovery responses; email to Cimone Nunley regarding meet and confer efforts.
1/3/2019	Navruz Avloni	Communication	0.3	Telephone call with Defendant Tesla's counsel Tracey Kennedy regarding litigation.
1/3/2019	Navruz Avloni	Communication	0.2	Telephone call with client Owen Diaz regarding case status.
1/3/2019	Navruz Avloni	Meet	0.2	Meet with Larry Organ prior to meeting with Tracey Kennedy
1/3/2019	Navruz Avloni	Meet	0.1	Meet with Larry Organ after meeting with Tracey Kennedy
1/6/2019	Navruz Avloni	Communication	0.1	Email to Sabrina Grislis regarding calendaring new deadlines pursuant to signed order.
1/7/2019	Navruz Avloni	Research	0.2	Research regarding case issues
1/7/2019	Navruz Avloni	Communication	0.3	Meet with Larry Organ regarding strategy
1/10/2019	Navruz Avloni	Review/ Analyze	0.1	Reviewed research regarding trial testimony
1/11/2019	Navruz Avloni	Review/ Analyze	0.1	Reviewed emails between counsel for Tesla and Larry Organ; calendared Defendant nextSource's deadline to file responsive pleading; email to team.
1/21/2019	Navruz Avloni	Review/ Analyze	0.1	Reviewed Tesla's answer to the first amended complaint.
1/22/2019	Navruz Avloni	Meet	0.1	team meeting
1/22/2019	Navruz Avloni	Communication	0.1	Telephone call with opposing counsel regarding responsive pleading.

Date	User	Activity	Time	Description
1/25/2019	Navruz Avloni	Review/ Analyze	0.1	Reviewed substitution of attorney form; email instructions to Sabrina Grislis regarding updating our Proof of Service.
2/7/2019	Navruz Avloni	Communication	0.2	Discuss potential settlement of case with Cimone Nunley and Larry Organ
2/12/2019	Navruz Avloni	Communication	0.1	Discussion with Cimone Nunley regarding meet and confer letter to Defendant Tesla regarding its discovery responses; email to/from team regarding status.
2/12/2019	Navruz Avloni	Draft/ Revise	0.3	Drafted email to Opposing Counsels regarding depositions meet and confer; discussed scheduling with Larry Organ; reviewed calendar; discussion with Julianne Stanford regarding Confidential Stuff.
2/12/2019	Navruz Avloni	Communication	0.2	Discussion with Larry Organ regarding Confidential Stuff.
2/12/2019	Navruz Avloni	Communication	0.1	Email exchange with counsel for Tesla Tracey Kennedy regarding meet and confer on deposition scheduling.
2/14/2019	Navruz Avloni	Communication	0.1	Email exchange with opposing counsels regarding protective order
2/20/2019	Navruz Avloni	Communication	0.1	Discussion with Cimone Nunley regarding relationship between Citistaff and Tesla.
2/20/2019	Navruz Avloni	Communication	0.1	Email to Opposing Counsels regarding depositions and discovery
2/20/2019	Navruz Avloni	Communication	0.1	Email exchange with Tracey Kenney, counsel for Tesla, regarding availability for depositions.
2/20/2019	Navruz Avloni	Communication	0.1	Discussed discovery with Cimone Nunley
3/7/2019	Navruz Avloni	Communication	0.3	Discussed depositions and discovery with Cimone Nunley
3/11/2019	Navruz Avloni	Communication	0.2	Discussed supplementing initial disclosures with Cimone Nunley
3/13/2019	Navruz Avloni	Communication	0.3	Discussed discovery with Cimone Nunley
3/13/2019	Navruz Avloni	Meet	0.3	Meet with Cimone Nunley regarding discovery and deposition notices
3/18/2019	Navruz Avloni	Communication	0.1	Discuss deposition scheduling with Cimone Nunley
3/26/2019	Navruz Avloni	Communication	0.1	Discuss demand for site inspection with Cimone Nunley
3/26/2019	Navruz Avloni	Communication	0.1	Discussion with Cimone Nunley regarding supplemental initial disclosures and depositions.
3/26/2019	Navruz Avloni	Communication	0.1	Discuss potential Plaintiff's MSJ with Cimone Nunley
3/26/2019	Navruz Avloni	Review/ Analyze	0.1	Reviewed site inspection notice.
3/29/2019	Navruz Avloni	Review/ Analyze	0.1	Reviewed Tesla's response to Plaintiffs' meet and confer letter regarding discovery

Date	User	Activity	Time	Description
3/29/2019	Navruz Avloni	Meet	1	Meeting with Larry Organ and Cimone Nunley to discuss depositions, meet and confer regarding Tesla discovery, and outstanding documents due
3/29/2019	Navruz Avloni	Draft/ Revise	0.1	Updated witness list in deposition folder
3/29/2019	Navruz Avloni	Draft/ Revise	0.1	Updated task list regarding discovery, depositions
3/29/2019	Navruz Avloni	Draft/ Revise	0.3	Reviewed history of meet and confer efforts with Defendant nextSource regarding initial disclosures; meet and confer email to counsel for nextSource regarding its failure to produce initial disclosures. Calendared internal deadlines
3/29/2019	Navruz Avloni	Communication	0.1	Second round of email exchange with counsel for nextSource regarding initial disclosures; calendared production deadline.
3/29/2019	Navruz Avloni	Communication	0.2	Reviewed meet and confer history regarding depositions; email to opposing counsels regarding deposition scheduling.
3/29/2019	Navruz Avloni	Draft/ Revise	0.5	Reviewed and revised meet and confer response to Tesla re Tesla's insufficient discovery responses; email to Tesla counsel; calendared deadline to respond.
4/1/2019	Navruz Avloni	Communication	0.1	Email exchange with Citistaff attorneys regarding the deposition scheduling of their PMK
4/1/2019	Navruz Avloni	Communication	0.1	Email exchange with Cheryl Stevens, counsel for Citistaff, regarding depositions.
4/1/2019	Navruz Avloni	Communication	0.1	Telephone call with Larry Organ regarding the Citistaff deposition.
4/2/2019	Navruz Avloni	Communication	0.1	Discussed discovery priorities with Cimone Nunley
4/3/2019	Navruz Avloni	Communication	0.1	Telephone call with counsel for nextSource Aaron Langberg regarding initial disclosures and depositions.
4/4/2019	Navruz Avloni	Communication	0.1	Email exchange with Cimone Nunley
4/4/2019	Navruz Avloni	Communication	3	Meeting with Jeannette Vaccaro regarding discovery and Me Too witnesses
4/5/2019	Navruz Avloni	Review/ Analyze	0.4	Reviewed initial disclosures from Defendant nextSource; email to opposing counsel.
4/16/2019	Navruz Avloni	Communication	0.1	Discussed stipulation with counsel for West Valley.
4/16/2019	Navruz Avloni	Communication	0.1	Discussed depositions of Tom Kawasaki and Michael Wheeler with Cimone Nunley.
4/16/2019	Navruz Avloni	Communication	0.1	Email to Alameda County Superior Court regarding case status.
4/16/2019	Navruz Avloni	Communication	0.1	Email to Tracey Kennedy regarding Tesla's PMK deposition; instructions to team regarding amending notice.
4/17/2019	Navruz Avloni	Draft/ Revise	0.1	Reviewed and revised the deposition notice for Defendant Tesla's PMK.
4/17/2019	Navruz Avloni	Communication	0.1	Discussion with Counsel for West Valley Helene Simvoulakis regarding witnesses, site inspection.

Date	User	Activity	Time	Description
4/17/2019	Navruz Avloni	Meet	0.1	Team meeting
4/18/2019	Navruz Avloni	Review/ Analyze	0.1	Reviewed Defendant Tesla's objections to site inspection
4/19/2019	Navruz Avloni	Review/ Analyze	0.3	Reviewed the subpoenas to Michael Wheeler and Tom Kawasaki subpoenas; discussed service options with Cimone Nunley.
4/19/2019	Navruz Avloni	Draft/ Revise	0.5	Reviewed and revised meet and confer letter related to Tesla's discovery responses; email to counsel for Defendant Tesla regarding meet and confer efforts.
4/19/2019	Navruz Avloni	Communication	0.2	Email to counsel for nextSource Aaron Langberg regarding the depositions of nextSource's PMK and Wayne Jackson.
4/19/2019	Navruz Avloni	Communication	0.1	Email to potential expert Michael Robbins regarding the trial.
4/22/2019	Navruz Avloni	Communication	0.1	Message to/from Cimone Nunley re West Valley PMK prep.
4/23/2019	Navruz Avloni	Communication	0.1	Email to/from Cimone Nunley re Michael Wheeler and Tamotsu Kawasaki subpoenas.
4/23/2019	Navruz Avloni	Communication	0.1	Email to expert Michael Robbins.
4/23/2019	Navruz Avloni	Communication	0.1	Email exchange with counsel for Tesla Reanne Swafford-Harris regarding a meet and confer meeting.
4/24/2019	Navruz Avloni	Communication	0.1	Discussed additional discovery to nextSource and Tesla with Cimone Nunley
4/24/2019	Navruz Avloni	Draft/ Revise	1.5	Drafted and revised discovery requests for Tesla; reviewed 1981 claims.
4/25/2019	Navruz Avloni	Communication	0.1	Email to counsel for Tesla regarding outstanding document production.
4/25/2019	Navruz Avloni	Communication	0.1	Discussion with Cimone Nunley regarding the depositions of nextSource's PMK and Wayne Jackson.
4/25/2019	Navruz Avloni	Communication	0.1	Discussion with Cimone Nunley regarding meet and confer letters to Tesla, West Valley, and Citistaff
4/25/2019	Navruz Avloni	Draft/ Revise	0.3	Revised and signed the deposition subpoenas for nextSource PMK and Wayne Jackson. Email to opposing counsel with subpoenas. Instructions to Sabrina Grislis regarding service and setting up a court reporter, etc. Confirmed calendared.
4/25/2019	Navruz Avloni	Communication	0.6	Telephone call with Demetrica Diaz, La'Drea Jones, and Owen Diaz regarding depositions; email to opposing counsel with availability.
4/30/2019	Navruz Avloni	Communication	0.1	Instructions to Sabrina Grislis regarding reaching out to emotional distress witness for availability.
4/30/2019	Navruz Avloni	Meet	0.1	Team meeting regarding next steps and strategy
4/30/2019	Navruz Avloni	Communication	0.1	Telephone call with witness Titus McCaleb.
4/30/2019	Navruz Avloni	Communication	0.1	Email to expert Michael Robbins.

Date	User	Activity	Time	Description
5/2/2019	Navruz Avloni	Communication	0.1	Email to Simone Nunley re Tesla's set 1 responses, outstanding issues.
5/2/2019	Navruz Avloni	Communication	0.1	Email to Tesla's counsel re meet and confer meeting for outstanding discovery issues.
5/3/2019	Navruz Avloni	Communication	0.2	Call with Titus mccaleb
5/4/2019	Navruz Avloni	Communication	0.1	Rev'd deposition notices for La'Drea Jones and Demetrica Holmes, saved, added to calendar, instructions to SN.
5/4/2019	Navruz Avloni	Communication	0.1	Email to counsel for all defendants re discovery meeting.
5/4/2019	Navruz Avloni	Review/ Analyze	0.1	Rev'd summary of outstanding Tesla discovery; saved.
5/4/2019	Navruz Avloni	Communication	0.1	Email to/from Titus McCaleb re availability for deposition.
5/4/2019	Navruz Avloni	Communication	0.1	Email to counsel for all defendants re Titus McCaleb's availability for deposition.
5/4/2019	Navruz Avloni	Draft/ Revise	0.5	Revised and finalized meet and confer letter to Tesla re their discovery responses; email to Tesla re meet and confer letter.
5/6/2019	Navruz Avloni	Communication	0.1	Email to all opposing counsel re scheduling of Titus McCaleb's depo.
5/6/2019	Navruz Avloni	Communication	0.1	Email to Titus McCaleb re putting date on hold.
5/9/2019	Navruz Avloni	Communication	0.1	Email to/from Tesla counsel re in person meeting to meet and confer re their discovery responses.
5/12/2019	Navruz Avloni	Review/ Analyze	0.1	Reviewed depo objection re Wayne Jackson.
5/12/2019	Navruz Avloni	Communication	0.1	Email to counsel for all defendants re Titus McCaleb depo location.
5/12/2019	Navruz Avloni	Communication	0.1	Email to Titus McCaleb re depo details.
5/12/2019	Navruz Avloni	Communication	0.1	Email to/from nextSource counsel Juan Araneda re Owen Diaz's availability for depo.
5/12/2019	Navruz Avloni	Communication	0.1	Email to Simone re emotional distress witness prep for depositions.
5/12/2019	Navruz Avloni	Communication	0.1	Email to/from counsel for all defendants re discovery disputes.
5/13/2019	Navruz Avloni	Communication	0.1	Email to court reporter re Kawasaki depo.
5/20/2019	Navruz Avloni	Appearance/ Attend	2.5	Met with Demetrica and LaDrea re depo prep (2.0); travel to/from (.5)
5/20/2019	Navruz Avloni	Plan/ Prepare	0.2	prepared for call with expert Michael Robbins.
5/20/2019	Navruz Avloni	Communication	0.4	Call with expert Michael Robbins re case.
5/21/2019	Navruz Avloni	Appearance/ Attend	10.4	Deposition of Demetrica Holmes (7.0); travel to/from depo (3.1); meeting with CLT (.3)



Date	User	Activity	Time	Description
5/21/2019	Navruz Avloni	Communication	0.3	Telephone call with Cimone Nunley regarding Tesla's discovery responses
5/22/2019	Navruz Avloni	Communication	0.1	Email to/from Tesla counsel Reanne Swafford-Harris re in-person meet and confer meeting.
5/22/2019	Navruz Avloni	Communication	0.2	Discussed discovery with Cimone Nunley
5/22/2019	Navruz Avloni	Meet	0.1	team meeting.
5/23/2019	Navruz Avloni	Communication	0.1	Email to Sabrina re Owen Diaz depo.
5/29/2019	Navruz Avloni	Plan/ Prepare	1.3	Tesla PMK depo prep: rev'd client's depo transcripts; rev'd new doc production; rev'd new discovery responses
5/30/2019	Navruz Avloni	Review/ Analyze	0.1	Reviewed deposition notice/doc requests for Owen Diaz, calendared deadlines.
5/31/2019	Navruz Avloni	Draft/ Revise	0.2	email to/from Citistaff counsel re citistaff PMK depo; amended notice; served OC via email; instructions to Sabrina Grislis re reserving room and court reporter.
5/31/2019	Navruz Avloni	Communication	0.1	Rev'd email from West Valley counsel re Kossaiyan depo/confidential designations; instructions to Sabrina Grislis .
5/31/2019	Navruz Avloni	Review/ Analyze	0.4	Rev'd Nextsource's discovery requests, reserched service re Federal Express - improper.
5/31/2019	Navruz Avloni	Communication	0.2	Email to La'Drea Jones re availability.
5/31/2019	Navruz Avloni	Communication	0.1	Email to opposing counsel for all defendants re expert disclosures.
5/31/2019	Navruz Avloni	Communication	0.2	Email to/from expert Michael Robbins re case. Reviewed/signed retainer.
5/31/2019	Navruz Avloni	Communication	0.1	Email to Tesla counsel Reanne Swafford-Harris re meet and confer disc meeting.
5/31/2019	Navruz Avloni	Communication	0.1	Text to LaDrea Jones re depo.
5/31/2019	Navruz Avloni	Plan/ Prepare	2	Rev'd docs and depo - for expert Michael Robbins; email to expert with requested info. TC with Michael Robbins. Brief call with Larry Organ.
6/3/2019	Navruz Avloni	Communication	0.2	discussed trial with Larry Organ
6/3/2019	Navruz Avloni	Communication	0.1	Email to/from Tesla counsel re in person meet and confer meeting.
6/4/2019	Navruz Avloni	Review/ Analyze	0.1	rev'd amended deposition notice for ladrea jones, instructions to Sabrina Grislis.
6/4/2019	Navruz Avloni	Communication	0.2	Email to Bernard Alexander with Complaint and declarations. Organized declarations.
6/4/2019	Navruz Avloni	Communication	0.1	Email to/from nextSource counsel Juan Araneda re trial continuance.
6/4/2019	Navruz Avloni	Communication	0.1	Email to/from Tesla counsel Patricia Jeng re Lamar Patterson deposition.



Date	User	Activity	Time	Description
6/4/2019	Navruz Avloni	Communication	0.2	Discussion with Larry Organ regarding potential association of Bernard Alexander
6/5/2019	Navruz Avloni	Communication	0.1	Email to Lamar Patterson ; VM to Lamar Patterson re depo
6/5/2019	Navruz Avloni	Communication	0.1	Email to/from Tesla's counsel's paralegal re Lamar Patterson depo.
6/5/2019	Navruz Avloni	Plan/ Prepare	1.5	Pulled docs for Larry Organ's Citistaff PMK depo; organized docs.
6/5/2019	Navruz Avloni	Communication	0.1	Email to Tesla counsel re trial continuance.
6/7/2019	Navruz Avloni	Communication	0.1	Phone call with Larry Organ regarding in-person meet and confer meeting with Tesla counsel
6/12/2019	Navruz Avloni	Review/ Analyze	0.5	Reviewed discovery responses to Tesla's Requests for Admission and Requests for Production, Set Two. discussed with Cimone Nunley.
6/12/2019	Navruz Avloni	Review/ Analyze	0.1	Reviewed email from Tesla counsel re stipulation and continuance.
6/12/2019	Navruz Avloni	Review/ Analyze	0.1	Saved notes from Larry Organ re judy timbreza.
6/12/2019	Navruz Avloni	Communication	0.4	Communication with Larry Organ and Cimone Nunley regarding discovery responses
6/14/2019	Navruz Avloni	Communication	0.1	email to/from oC nextsource re extension of time to respond to their discovery requests to Owen Diaz and Demetric Di-az
6/17/2019	Navruz Avloni	Meet	4.4	prep for meeting with titus mccaleb (.5); meeting with titus mccaleb (2.7); travel to/from meeting with titus mccaleb (1.2)
6/17/2019	Navruz Avloni	Meet	0.4	Meeting with Larry Organ re strategy - Titus Mccaleb, nextSource, owen diaz depo
6/17/2019	Navruz Avloni	Review/ Analyze	0.1	Reviewed Owen Diaz depo notice.
6/17/2019	Navruz Avloni	Communication	0.1	Email to counsel for all defendants re La'Drea Jones depo
6/17/2019	Navruz Avloni	Communication	0.1	Email to/from Larry Organ, Cimone Nunley, and Sabrina Grislis re Demetrica Holmes depo
6/17/2019	Navruz Avloni	Communication	0.1	Telephone call with Cimone Nunley regarding Owen Diaz's deposition prep
6/18/2019	Navruz Avloni	Appearance/ Attend	10	appeared for mccaleb depo (6); meeting with Owen Diaz (1); travel to/from (3)
6/18/2019	Navruz Avloni	Review/ Analyze	0.1	rev'd court order re stip to continue trial.
6/18/2019	Navruz Avloni	Communication	0.1	Email to expert Michael Robbins re update, trial date, etc.
6/18/2019	Navruz Avloni	Communication	0.1	Email to Sabrina Grislis re saving nextsource docs.
6/19/2019	Navruz Avloni	Communication	0.1	Email to expert Michael Robbins re retainer.
6/20/2019	Navruz Avloni	Appearance/ Attend	6	LaDrea Jones Depo appear (2.0); meeting with CLT (1.0); travel to/from (3)

Date	User	Activity	Time	Description
6/20/2019	Navruz Avloni	Communication	0.1	Email to Cimone Nunley re key witnesses to depose
6/20/2019	Navruz Avloni	Communication	0.1	Telephone call with Cimone Nunley regarding depositions, discovery responses
6/21/2019	Navruz Avloni	Plan/ Prepare	1.5	Reviewed Owen Diaz's depo transcripts and summary in prep for day 3 depo.
6/21/2019	Navruz Avloni	Appearance/ Attend	5.5	appeared for Owen Diaz depo (4); travel to/from (1.0); discussion with client depo prep (.5)
6/24/2019	Navruz Avloni	Communication	0.1	Email to Kris Organ re payment to expert Michael Robbins.
6/28/2019	Navruz Avloni	Draft/ Revise	0.1	Forwarded Lamar Patterson deposition subpoena to witness.
7/1/2019	Navruz Avloni	Communication	0.1	Email to Cimone Nunley re Lamar Patterson depo
7/1/2019	Navruz Avloni	Review/ Analyze	0.1	Reviewed amended subpoena for Lamar Patterson's deposition.
7/1/2019	Navruz Avloni	Communication	0.1	Email to Sabrina Grislis re Titus McCaleb and La'drea Jones deposition transcripts.
7/2/2019	Navruz Avloni	Communication	0.1	Email to/from Sabrina Grislis re Owen Diaz's medical records
7/9/2019	Navruz Avloni	Communication	0.1	Email to Cimone Nunley re subpoena to California Civil Rights Law Group regarding case materials from the Dewitt Lambert arbitration.
7/10/2019	Navruz Avloni	Communication	0.2	Telephone call with Cimone Nunley regarding discovery plan
7/16/2019	Navruz Avloni	Meet	1.5	meeting re depositions, witnesses.
7/22/2019	Navruz Avloni	Communication	0.1	Email to/from Tesla counsel re subpoena to California Civil Rights Law Group regarding case materials from the Dewitt Lambert arbitration.
7/22/2019	Navruz Avloni	Communication	0.2	Discussion with Cimone Nunley re subpoena timing (to California Civil Rights Law Group regarding case materials from the Dewitt Lambert arbitration); discovery plan
7/22/2019	Navruz Avloni	Communication	0.1	discussion with Larry Organ re strategy.
7/22/2019	Navruz Avloni	Review/ Analyze	0.3	revised Requests for Production objections for Lamar Patterson deposition. email to Cimone Nunley re corrections.
7/22/2019	Navruz Avloni	Draft/ Revise	0.3	revised stipulation increasing number of depositions in this matter.
7/23/2019	Navruz Avloni	Review/ Analyze	0.1	reviewed revised stipulation regarding increasing number of depositions in this matter, counted depositions taken thus far, email to Cimone Nunley.
7/23/2019	Navruz Avloni	Communication	0.5	Call w/ Bernard Alexander, Larry Organ and Cimone Nunley re case
7/23/2019	Navruz Avloni	Communication	0.1	follow up discussion with Larry Organ/Cimone Nunley following meeting with Bernard Alexnader

Date	User	Activity	Time	Description
7/24/2019	Navruz Avloni	Draft/ Revise	1	Email to Bernard Alexander re summary; drafted summary; discussed with Cimone Nunley docs and list of witnesses. reviewed depo and docs
7/25/2019	Navruz Avloni	Communication	0.3	met with Cimone Nunley re Lamar Patterson deposition
7/25/2019	Navruz Avloni	Communication	0.1	email to team re adding danielle modica as witness to initial disclosures.
7/26/2019	Navruz Avloni	Appearance/ Attend	5.5	deposition of lamar patterson (4.0); travel to/from depo (1.5)
7/26/2019	Navruz Avloni	Meet	0.6	Met with client Owen Diaz re his employment with CitiStaff
7/26/2019	Navruz Avloni	Meet	0.3	Met with Tesla counsel Reanne Swafford-Harris re subpoena to California Civil Rights Law Group for case materials from the Dewitt Lambert arbitration.
7/29/2019	Navruz Avloni	Communication	0.1	Call w Cimone Nunley re Lamar Patterson deposition.
8/2/2019	Navruz Avloni	Communication	0.1	Email to counsel for all defendants re stipulation to increase the number of deposition
8/5/2019	Navruz Avloni	Meet	0.2	Meet with Cimone Nunley to discuss response to Tesla's meet and confer letter
8/5/2019	Navruz Avloni	Communication	0.1	Discuss Bernard Alexander's discovery request additions with Cimone Nunley and Larry Organ
8/6/2019	Navruz Avloni	Communication	0.3	Call w Cimone Nunley re joint discovery dispute statement re subpoena to California Civil Rights Law Group for case materials from Dewitt Lambert arbitration
8/7/2019	Navruz Avloni	Draft/ Revise	1	revised joint discovery dispute letter re subpoena to Californai Civil Rights Law Group for case materials from Dewitt Lambert arbitration.
8/8/2019	Navruz Avloni	Communication	0.1	Email to/from Citistaff counsel Cheryl Stephens re Citistaff's objection to stipulation to increase number of depositions.
8/8/2019	Navruz Avloni	Communication	0.1	Email to Sabrina Grislis re Lamar Patterson deposition transcript review.
8/8/2019	Navruz Avloni	Communication	0.1	Email to Sabrina Grislis re Lamar Patterson deposition transcript payment.
8/8/2019	Navruz Avloni	Communication	0.1	Email to Bernard Alexander re call/set up.
8/8/2019	Navruz Avloni	Communication	0.1	Email to all opposing counsel re joint discovery dispute statement re number of depositions
8/8/2019	Navruz Avloni	Communication	0.2	Discussion with Cimone Nunley regarding Tesla's modified discovery dispute letter
8/9/2019	Navruz Avloni	Draft/ Revise	1.3	revised joint discovery dispute statement re subpoena to California Civil Rights Law Group for case materials from the Dewitt Lambert arbitration
8/12/2019	Navruz Avloni	Draft/ Revise	0.3	Revised meet and confer letter re Owen Diaz's disc responses to Tesla
8/15/2019	Navruz Avloni	Communication	0.1	email to/from Bernard Alexander re availability.

Date	User	Activity	Time	Description
8/15/2019	Navruz Avloni	Communication	0.2	Discussion of additional discovery to propound with Cimone Nunley
8/16/2019	Navruz Avloni	Plan/ Prepare	0.1	Prepared for team meeting call - reviewed witness chart, call with Cimone Nunley.
8/16/2019	Navruz Avloni	Meet	0.6	Team meeting with Bernard Alexander, Cimone Nunley, Larry Organ re strategy, depos, discovery.
8/16/2019	Navruz Avloni	Communication	0.2	Call with Cimone Nunley re tasks for next week, outstanding meet and confers, etc.
8/16/2019	Navruz Avloni	Draft/ Revise	0.1	organized notes from team meeting into action items; circulated to Bernard Alexander, Larry Organ, Cimone Nunley, and Sabrina Grislis.
8/19/2019	Navruz Avloni	Review/ Analyze	0.2	Reviewed Orrick's order re discovery dispute; discussion with Larry Organ.
8/19/2019	Navruz Avloni	Review/ Analyze	0.1	Revised Larry Organ's letter to Tesla's counsel for the Dewitt Lambert arbitration, Danielle Ochs, re subpoena to Californai Civil Rights Law Group for case materials from Dewitt Lambert arbitration.
8/23/2019	Navruz Avloni	Communication	0.1	email to counsel for all defendants to meet and confer re number and scheduling of depositions
8/23/2019	Navruz Avloni	Communication	0.1	email to Bernard Alexander re assoc. of counsel.
8/26/2019	Navruz Avloni	Communication	0.1	Email to/from Bernard Alexander re association of counsel.
8/27/2019	Navruz Avloni	Communication	0.1	Instructions to Sabrina Grislis re filing assoc of counsel for Bernard Alexander
9/2/2019	Navruz Avloni	Communication	0.1	Email to all OC to meet and confer regarding scheduling for additional depositions
9/2/2019	Navruz Avloni	Communication	0.1	Email to Bernard Alexander, Larry Organ, Cimone Nunley, and Sabrina Grislis re joint case management statement; email to West Valley counsel Cheryl Stephens re joint case management statement.
9/2/2019	Navruz Avloni	Draft/ Revise	0.1	revised joint case management statement.
9/2/2019	Navruz Avloni	Draft/ Revise	0.3	revised joint discovery dispute letter regarding Tesla's discovery responses; Email to counsel for Tesla re discovery dispute.
9/2/2019	Navruz Avloni	Communication	0.1	Email to counsel for all defendants re stipulation to change time for MSJ opposition and reply filings
9/2/2019	Navruz Avloni	Communication	0.1	Email to Cimone Nunley re next steps/strategy.
9/3/2019	Navruz Avloni	Communication	0.1	Email to/from Tesla counsel Patricia Jeng re Joint Discovery Dispute letter regarding Tesla's discovery responses.
9/3/2019	Navruz Avloni	Communication	0.1	Email to all opposing counsel with joint case management statement; reviewed Larry Organ's revisions.
9/3/2019	Navruz Avloni	Communication	0.2	Discussion with Larry Organ re Tesla PMK topics
9/3/2019	Navruz Avloni	Communication	0.1	Email to Tesla counsel re PMK topics.

Date	User	Activity	Time	Description
9/4/2019	Navruz Avloni	Communication	0.1	Email to Tesla counsel re PMK topic numbers.
9/9/2019	Navruz Avloni	Communication	0.1	Emails to/from all opposing counsel re discovery dispute meeting.
9/9/2019	Navruz Avloni	Communication	0.1	Email to Tesla counsel Patricia Jeng re PMK topics.
9/9/2019	Navruz Avloni	Plan/ Prepare	1	prepared for meeting with tesla, citistaff and nextsource counsel re pmk topics, as well as number of depositions
9/9/2019	Navruz Avloni	Meet	2.7	Meet & confer with Tesla's counsel re pMK topics/refusal to meet and confer; met and conferred with nextSource counsel re pmk topics; met and conferred with Citistaff, Tesla, and nextSource counsel re number of depos; met and conferred with cs re pmk topics.
9/9/2019	Navruz Avloni	Travel Expense	1.1	travel to/from fisher phillips to meet and confer with all opposing counsel re pmk topics, number of depos, stipulation re msj briefing schedule
9/9/2019	Navruz Avloni	Review/ Analyze	0.1	Reviewed new docs from Tesla - map, job descriptions, etc.
9/9/2019	Navruz Avloni	Communication	0.2	Telephone call with Cimone Nunley after my meet and confer meeting with Opposing Counsel
9/9/2019	Navruz Avloni	Communication	0.1	Discussion with Cimone Nunley regarding her meet and confer efforts with opposing counsel to prepare for meet and confer meeting
9/9/2019	Navruz Avloni	Communication	0.1	Call with Cimone Nunley regarding PMK issues with Citistaff, nextSource, and Tesla
9/9/2019	Navruz Avloni	Communication	0.5	Call with Cimone Nunley prior to my meet and confer meeting with opposing counsel for her to help prep me
9/10/2019	Navruz Avloni	Communication	0.1	Email to Bernard Alexander re case management and strategy.
9/10/2019	Navruz Avloni	Communication	0.2	Call w/ Cimone Nunley re discovery
9/10/2019	Navruz Avloni	Appearance/ Attend	2.6	travel to CMC - attend CMC - return from CMC
9/10/2019	Navruz Avloni	Communication	0.2	discussed with Cimone Nunley discovery/motion task list
9/10/2019	Navruz Avloni	Review/ Analyze	0.4	Revieweddd trial related calendaring; added missing dates. Email to Sabrina Grislis re further instructions.
9/10/2019	Navruz Avloni	Communication	0.1	Email to Tesla counsel re failure to respond to RPD, Set 7
9/10/2019	Navruz Avloni	Communication	0.1	Email to Tesla counsel re PMK topics.
9/10/2019	Navruz Avloni	Communication	0.1	Email to nextSource counsel re PMK topics
9/10/2019	Navruz Avloni	Draft/ Revise	0.4	Revised meet and confer letter to nextsource re PMK topics.
9/10/2019	Navruz Avloni	Communication	0.1	Email to Bernard Alexander re psych expert.

Date	User	Activity	Time	Description
9/10/2019	Navruz Avloni	Review/ Analyze	0.4	Reviewed Tesla's response to requests for production Nos. 65-68 - reviewed docs/other responses to confirm docs not produced. Email to Tesla counsel re issue with no responsive docs being produced, request to amend, withdraw issue from joint dispute letter
9/10/2019	Navruz Avloni	Draft/ Revise	2	Reviewed meet and confer history; Revised joint dispute letter re number of depositions; email to all opposing counsel re joint dispute letter and MSJ briefing schedule; email to team re revisions and strategy
9/11/2019	Navruz Avloni	Communication	0.1	Email to/from Tesla counsel regarding responses to requests for production and joint dispute letter.
9/11/2019	Navruz Avloni	Review/ Analyze	0.2	Rev'd Bernard Alexander case law on N-word.
9/11/2019	Navruz Avloni	Research	1.3	Researched psychs; email to team with finding. researched psych treatment for black men, etc.
9/11/2019	Navruz Avloni	Review/ Analyze	0.1	Rev'd Tracey Kennedy's email re Tesla's discovery responses. instructions to Sabrina Grislis re proof of service - include LA address; calendared dl
9/12/2019	Navruz Avloni	Meet	1.2	Meet with Cimone Nunley, Larry Organ, and Bernard Alexander to discuss discovery and expert strategy
9/12/2019	Navruz Avloni	Meet	0.3	Meeting with Cimone Nunley & Larry Organ re Tesla PMK topics
9/12/2019	Navruz Avloni	Draft/ Revise	0.2	further revised telsa discovery joint dispute letter.
9/12/2019	Navruz Avloni	Communication	0.1	Email to/from Tesla counsel re Plaintiffs' discovery responses.
9/12/2019	Navruz Avloni	Communication	0.1	Email to Bernard Alexander re pleadings.
9/12/2019	Navruz Avloni	Communication	0.2	Summarized team meeting notes; email to team re: delegated tasks
9/12/2019	Navruz Avloni	Communication	0.1	Email to all opposing counsel re MSJ briefing schedule & additional depositions
9/13/2019	Navruz Avloni	Communication	0.1	Email to Tesla counsel re meet and confer on discovery
9/13/2019	Navruz Avloni	Review/ Analyze	0.1	Reviewed bernarTesla's addition to opening
9/13/2019	Navruz Avloni	Communication	0.1	Email to/from nextsource atty re pmk depo
9/13/2019	Navruz Avloni	Plan/ Prepare	0.7	Prepared for meeting with Tesla counsel re Tesla pMK topics; and Plaintiffs' discovery responses
9/13/2019	Navruz Avloni	Meet	2.7	met with tesla oc re pmk topics, depositions, scheduling, plaintiffs' disc responses (1.3); travel to/from (1.4)
9/13/2019	Navruz Avloni	Communication	0.1	Communication with Cimone Nunley regarding scheduling with opposing counsel and setting up meeting with opposing counsel
9/13/2019	Navruz Avloni	Communication	0.2	Telephone call with Cimone Nunley regarding meet and confer related to the PMK topics

Date	User	Activity	Time	Description
9/17/2019	Navruz Avloni	Communication	0.1	Email to all opposing counsel re number of depositions issue.
9/17/2019	Navruz Avloni	Communication	0.1	Reviewed revisions to joint dispute re written discovery
9/17/2019	Navruz Avloni	Communication	0.1	Email to all opposing counsel re joint dispute - written discovery meet and confer.
9/17/2019	Navruz Avloni	Communication	0.1	discussed dispute letter regarding number of depositions with Cimone Nunley.
9/17/2019	Navruz Avloni	Communication	0.1	Reviewed order re MSC - email to team re availability; reviewed calendar
9/18/2019	Navruz Avloni	Communication	0.1	Email to Sabrina Grislis re MSC.
9/18/2019	Navruz Avloni	Review/ Analyze	0.1	Reviewed new document production from Tesla.
9/19/2019	Navruz Avloni	Communication	0.1	Email to/from Juan re meet and confer meeting regarding nextSource PMK topics
9/19/2019	Navruz Avloni	Review/ Analyze	0.1	Reviewed defendants' portion to number of depositions dispute letter; Email to all defendants' counsel.
9/19/2019	Navruz Avloni	Communication	0.1	discussed outstanding discovery with Larry Organ and Cimone Nunley
9/19/2019	Navruz Avloni	Draft/ Revise	0.3	revised Plaintiffs' discovery requests to tesla - instructions to Sabrina Grislis for service - worked on language.
9/19/2019	Navruz Avloni	Communication	0.1	Discussion with staff regarding Tesla RPD issue
9/20/2019	Navruz Avloni	Communication	0.1	Call w/ Cimone Nunley re joint dispute letter regarding number of depositions
9/23/2019	Navruz Avloni	Communication	0.2	Call w/ Larry Organ re experts.
9/23/2019	Navruz Avloni	Communication	0.1	Email to expert michael robbins re expert report.
9/23/2019	Navruz Avloni	Communication	0.1	Email to/from expert Michael Robbins.
9/24/2019	Navruz Avloni	Communication	0.1	Email to all opposing counsel re expert disclosures.
9/24/2019	Navruz Avloni	Communication	0.1	Voicemail and Email to nextSource re meet and confer over PMK topics.
9/27/2019	Navruz Avloni	Communication	0.3	Telephone call with Bernard Alexander and Larry Organ regarding experts
9/27/2019	Navruz Avloni	Meet	0.1	Meet with Larry Organ regarding experts
9/28/2019	Navruz Avloni	Review/ Analyze	0.1	Reviewed meet and confer letter to nextSource re PMK topics. Instructions to Cimone Nunley.
10/1/2019	Navruz Avloni	Communication	0.1	instructions to Sabrina Grislis re notices and subpoenas for additional depositions of Marconi, Kawasaki, V. Martinez, and Delgado
10/1/2019	Navruz Avloni	Meet	0.1	Team Meeting



Date	User	Activity	Time	Description
10/2/2019	Navruz Avloni	Communication	0.1	Call with Owen Diaz re Citistaff
10/2/2019	Navruz Avloni	Review/ Analyze	0.2	Reviewed Tesla's responses to RPD, Set 3
10/2/2019	Navruz Avloni	Communication	0.1	Email to Tesla's counsel re Rpd, set 7 responses and objections.
10/3/2019	Navruz Avloni	Review/ Analyze	0.1	reviewed discovery dispute order
10/3/2019	Navruz Avloni	Plan/ Prepare	1.3	Reviewed judge's order; discussed which additional depositions to take with team; calendared out depositions - created chart; instructions to Sabrina Grislis re subpoena service/dates/etc.
10/3/2019	Navruz Avloni	Communication	0.1	Recap to team re strategy depo.
10/3/2019	Navruz Avloni	Communication	0.1	Email to Kathy re AZ location for deposition of Jackelin Delgado
10/3/2019	Navruz Avloni	Communication	0.2	Email to all opposing counsel with proposed depo schedule, details, etc.
10/3/2019	Navruz Avloni	Review/ Analyze	0.2	Reviewed depo notices and subpoenas for Marconi, Kawasaki, V. Martinez, and Delgado depositions
10/3/2019	Navruz Avloni	Communication	0.6	Discussion with Larry Organ, Cimone Nunley, and Bernard Alexander regarding deposition strategy for Marconi, Kawasaki, V. Martinez, and Delgado depositions
10/3/2019	Navruz Avloni	Communication	0.2	Discussion with Larry Organ and Cimone Nunley regarding strategy
10/4/2019	Navruz Avloni	Communication	0.1	Communication with Larry Organ and Cimone Nunley regarding expert Amy Oppenheimer
10/8/2019	Navruz Avloni	Communication	0.1	Email to Sabrina Grislis re kawasaki deposition.
10/8/2019	Navruz Avloni	Communication	0.1	Email to all opposing counsel re Marconi, Kawasaki, V. Martinez, and Delgado depositions.
10/8/2019	Navruz Avloni	Communication	0.1	Email to all opposing counsel re time estimates for Marconi, Kawasaki, V. Martinez, and Delgado depositions.
10/8/2019	Navruz Avloni	Research	0.2	Prepare for deposition of Erin Marconi
10/8/2019	Navruz Avloni	Meet	0.1	discussed Marconi, Kawasaki, V. Martinez, and Delgado deposition logistics with Larry Organ
10/8/2019	Navruz Avloni	Communication	0.1	Email to Cimone Nunley re nextSource discovery responses.
10/8/2019	Navruz Avloni	Meet	1.3	Team meeting re discovery and outstanding depositions
10/9/2019	Navruz Avloni	Review/ Analyze	0.1	Rev'd email from Josue Torres; discussed with Larry Organ.
10/9/2019	Navruz Avloni	Communication	0.1	discussed with Cimone Nunley re witnesses, potentially deposing Josue Torres.
10/9/2019	Navruz Avloni	Communication	0.1	Email to Josue Torres



Date	User	Activity	Time	Description
10/9/2019	Navruz Avloni	Communication	0.3	Discuss deposition scheduling for Marconi, Kawasaki, V. Martinez, and Delgado depositions and remote access issues with Cimone Nunley
10/10/2019	Navruz Avloni	Other	0.3	Reviewed Dr. Reading's report; saved docs to file.
10/10/2019	Navruz Avloni	Communication	0.1	Researched Josue Torres's current whereabouts for service
10/10/2019	Navruz Avloni	Communication	0.1	email to/from chartwell re Jackelin Delgado deposition
10/10/2019	Navruz Avloni	Communication	0.2	Call with Cimone Nunley and Larry Organ re expert disclosures
10/10/2019	Navruz Avloni	Communication	0.1	Discuss deposition scheduling with Larry Organ and Cimone Nunley
10/10/2019	Navruz Avloni	Communication	0.1	Discuss logistics, service, and timing Josue Torres deposition with Cimone Nunley
10/11/2019	Navruz Avloni	Communication	0.1	Email to Chartwell counsel re veronica martinez depo.
10/11/2019	Navruz Avloni	Communication	0.1	Email to Chartwell Counsel re Veronica Martinez deposition subpoena.
10/11/2019	Navruz Avloni	Communication	0.1	Reviewed email from Tesla regarding their RPD responses
10/14/2019	Navruz Avloni	Draft/ Revise	0.2	Revised marconi deposition stipulation; email to/from Sabrina Grisli, Cimone Nunley, Bernard Alexander, and Larry Organ.
10/14/2019	Navruz Avloni	Draft/ Revise	0.2	Further revised stipulation regarding Marconi deposition; email to /from Tesla counsel Patricia Jeng
10/14/2019	Navruz Avloni	Communication	0.1	Email to all opposing counsel re marconi deposition stipulation.
10/14/2019	Navruz Avloni	Communication	0.1	Email to/from Susan re Marconi deposition stipulation.
10/14/2019	Navruz Avloni	Plan/ Prepare	0.3	Prepared for meeting with Tesla counsel Patricia Jeng re Tesla RPD responses.
10/14/2019	Navruz Avloni	Communication	2.2	met and conferred in person with Tesla counsel Patricia Jeng re tesla discovery responses (.7); travel to/from (1.5)
10/14/2019	Navruz Avloni	Communication	0.1	Telephone call with Larry Organ and Cimone Nunley regarding Marconi deposition stipulation
10/15/2019	Navruz Avloni	Communication	0.1	Email to Patricia Jeng re Tesla's responses to RPD, Set 7.
10/15/2019	Navruz Avloni	Communication	0.2	Discussion with Cimone Nunley re Tesla's responses to RPD, set 7.
10/15/2019	Navruz Avloni	Review/ Analyze	0.6	Reviewed citistaff pmk and tesla pmk discovery dispute letters
10/16/2019	Navruz Avloni	Review/ Analyze	0.5	Reviewed doc production; discussed with Cimone Nunley; email to team.
10/16/2019	Navruz Avloni	Communication	0.2	discussed Veronica Martinez deposition and discovery with Larry Organ and Cimone Nunley.
10/16/2019	Navruz Avloni	Communication	0.2	Discussed deposition of Veronica Martinez with Larry Organ and Cimone Nunley

Date	User	Activity	Time	Description
10/17/2019	Navruz Avloni	Communication	0.2	Call with Cimone Nunley re Citistaff MSJ
10/18/2019	Navruz Avloni	Review/ Analyze	0.1	Reviewed stipulation to extend time to file discovery dispute letters
10/18/2019	Navruz Avloni	Communication	0.2	meet and confer with Patricia Jeng re Donet deposition
10/18/2019	Navruz Avloni	Review/ Analyze	1.5	Reviewed, revised joint dispute letters re site inspection and tesla PMK. discuss with Cimone Nunley re strategy. discussion with Larry Organ re discovery dispute issues strategy.
10/21/2019	Navruz Avloni	Review/ Analyze	0.1	Reviewed notice of recent decision drafted by Cimone Nunley re Martinez decision - instructions for filing, review by Larry Organ.
10/22/2019	Navruz Avloni	Communication	0.3	Discuss all defendants' PMK topics and Josue Torres with Cimone Nunley
10/23/2019	Navruz Avloni	Communication	0.1	Reviewed Orrick's order on discovery disputes.
10/23/2019	Navruz Avloni	Communication	0.1	Email to all opposing counsel re scheduling Donet depo.
10/23/2019	Navruz Avloni	Communication	0.1	Communication with Larry Organ regarding discovery order
10/24/2019	Navruz Avloni	Communication	0.2	Call w Larry Organ re Donet depo - alerted to time, location, documents to pull, strategy, logistics
10/24/2019	Navruz Avloni	Draft/ Revise	0.2	Communication with Cimone Nunley re SROGs to next source, reviewed PMK topics at issue - revised SROGs drafted by Cimone Nunley accordingly, email to nextSource counsel serving SROGs, email to Sabrina Grislis instructions to serve via US mail on all parties.
10/24/2019	Navruz Avloni	Plan/ Prepare	0.2	Pulled docs for Donet depo; instuctions to Sabrina Grislis re trial subpoena, etc.
11/4/2019	Navruz Avloni	Communication	0.1	Call with Cimone Nunely and Larry Organ regarding Natasha assisting on deposition summaries
11/8/2019	Navruz Avloni	Communication	0.2	Discussed expert depositions/supplementing initial disclosures/shifting expert discovery cutoff with Cimone Nunley and Larry Organ
11/8/2019	Navruz Avloni	Communication	0.1	Provide feedback to Cimone Nunley regarding her email to opposing counsel regarding the Court's October 3 discovery order
11/13/2019	Navruz Avloni	Draft/ Revise	0.3	Prepared discovery requests for Citistaff; Email to Cimone Nunley.
11/23/2019	Navruz Avloni	Communication	0.1	Reviewed Cimone Nunley's email to/from Tesla counsel Patricia Jeng re witness contact information. Email to Cimone Nunley re Citistaff discovery disputes.
12/27/2019	Navruz Avloni	Communication	0.1	Email to Larry Organ, Cimone Nunley, Bernard Alexander, and Sabrina Grislis re trial related deadlines.
12/27/2019	Navruz Avloni	Review/ Analyze	0.1	Reviewed Citistaff responses to SROG, Set 2.
12/27/2019	Navruz Avloni	Communication	0.1	Email to/from Cimone Nunley, Larry Organ, Sabrina Grislis, and Bernard Alexander re deadlines.

Date	User	Activity	Time	Description
1/2/2020	Navruz Avloni	Review/ Analyze	1	Reviewed and revised MSC statement
1/2/2020	Navruz Avloni	Meet	0.6	Meet with Bernard Alexander, Cimone Nunley, Larry Organ and Susan Organ re MSC and case strategy
1/3/2020	Navruz Avloni	Communication	0.4	Discussed with Larry Organ and Cimone Nunley sanctions motion, depositions, witnesses, trial strategy.
1/10/2020	Navruz Avloni	Draft/ Revise	0.3	Revised declaration in support of motion for sanctions.
1/13/2020	Navruz Avloni	Communication	0.1	Discussion with Cimone Nunley re mediation.
1/13/2020	Navruz Avloni	Communication	0.1	Email to team re Reading deposition.
1/14/2020	Navruz Avloni	Review/ Analyze	0.1	Reviewed request for unredacted info from Tesla. Instructions to Sabrina Grislis.
1/14/2020	Navruz Avloni	Meet	0.1	Team Meeting
1/17/2020	Navruz Avloni	Communication	0.1	Email to/from Citistaff counsel Cheryl Stephens re designations.
1/17/2020	Navruz Avloni	Communication	0.1	Call w/ Cimone Nunley re citistaff confidentiality designations.
1/17/2020	Navruz Avloni	Communication	0.1	Discussion with Larry Organ and Cimone Nunley re Owen Diaz's personnel info disclosed in discovery.
1/17/2020	Navruz Avloni	Other	0.1	Resolved EXTTI billing for depositions.
1/20/2020	Navruz Avloni	Communication	0.1	Email to/from expert Amy Oppenheimer re availability.
1/20/2020	Navruz Avloni	Communication	0.1	Email to Tesla's counsel re Amy Oppenheimer deposition.
1/23/2020	Navruz Avloni	Review/ Analyze	0.1	Reviewed Tesla motion re retaining confidentiality of documents and attached athina martinez declaration.
1/27/2020	Navruz Avloni	Communication	0.1	Email to Bernard Alexander re trial date.
1/27/2020	Navruz Avloni	Communication	0.1	discussed with Cimone Nunley reply re motion for sanctions.
1/28/2020	Navruz Avloni	Communication	0.1	Email to Tesla counsel Patricia Jeng re Amy Oppenheimer depo; email to/from Amy Oppenheimer re depo time; Calendared Amy Oppenheimer depo.
2/3/2020	Navruz Avloni	Review/ Analyze	1.1	Motion for sanctions - reviewed motion and supporting docs; reviewed opp and supporting docs.
2/3/2020	Navruz Avloni	Draft/ Revise	2.6	Revised reply ISusan Organ of motion for sanctions, admin motion, Sabrina Grislis and Cimone Nunley decl, discussion with Cimone Nunley, discussion with Sabrina Grislis .
2/5/2020	Navruz Avloni	Communication	0.1	Emails re meeting with Harry.
2/13/2020	Navruz Avloni	Communication	1.1	Telephone call with Larry Organ, Bernard Alexander, Cimone Nunley, Susan Organ, and jury consultant Harry Plotkin regarding trial strategy and preparation

Date	User	Activity	Time	Description
2/17/2020	Navruz Avloni	Communication	0.1	Email to Harry re focus group with Nichols Research.
2/19/2020	Navruz Avloni	Communication	0.2	Discussion with Cimone Nunley re item/to-do list.
2/19/2020	Navruz Avloni	Communication	0.1	Emailed team docs re potential witness Jackel Williams.
2/19/2020	Navruz Avloni	Communication	0.1	Email to/from Amy Oppenheimer re call.
2/19/2020	Navruz Avloni	Communication	0.1	Email to Plotkin re focus group. Email to Larry Organ re payment.
2/20/2020	Navruz Avloni	Communication	0.1	Email to Bernard re plotkin cost.
2/24/2020	Navruz Avloni	Review/ Analyze	0.4	Rev'd Amy Oppenheimer's amended report; noted comments; email to team.
2/29/2020	Navruz Avloni	Review/ Analyze	0.1	Skimmed through Amy Oppenheimer report; email to Larry Organ re updated report.
3/3/2020	Navruz Avloni	Communication	0.1	Rev'd email from Harry re voir dire ideas. Instructions to Cimone Nunley re next steps.
3/5/2020	Navruz Avloni	Communication	0.1	Discussion with Larry Organ regarding expert Amy Oppenheimer and strategy
3/11/2020	Navruz Avloni	Communication	0.1	Discussion with Cimone Nunley re witness Jackel.
3/21/2020	Navruz Avloni	Review/ Analyze	0.8	Reviewed and revised Motion in Limine 1. Researched to make sure nothing missing.
3/21/2020	Navruz Avloni	Draft/ Revise	0.3	Revised/Reviewed Motion in Limine 2.
3/21/2020	Navruz Avloni	Review/ Analyze	0.4	Rev'd and revised Motion in Limine 3; researched case law.
3/21/2020	Navruz Avloni	Review/ Analyze	0.4	Reviewed and revised Motion in Limine 4; researched cases.
3/21/2020	Navruz Avloni	Review/ Analyze	0.1	Rev'd Motion in Limine No. 5
3/21/2020	Navruz Avloni	Review/ Analyze	0.4	Rev'd Motion in Limine 6; research.
3/21/2020	Navruz Avloni	Communication	0.2	Email to Cimone Nunley/Larry Organ re Motions in Limine; text to Cimone Nunley and Larry Organ re Motions in Limine.
3/22/2020	Navruz Avloni	Communication	0.5	Call w/ Cimone Nunley and Larry Organ re strategy.
3/23/2020	Navruz Avloni	Review/ Analyze	0.1	Rev'd Motion in Limine 7, email to Cimone Nunley with feedback.
3/23/2020	Navruz Avloni	Communication	0.1	Email to/from Amy Oppenheimer re depo check.
3/24/2020	Navruz Avloni	Communication	0.2	Call w/ Larry Organ, and then Cimone Nunley re Motions in Limine, me too, punitive damages.
3/26/2020	Navruz Avloni	Other	0.1	Instructions to Sabrina Grislis re Amy Oppenheimer payment/transcript.

Date	User	Activity	Time	Description
3/27/2020	Navruz Avloni	Communication	0.4	Discussion with Larry Organ and Cimone Nunley re strategy.
3/27/2020	Navruz Avloni	Communication	0.1	Email to/from Sabrina Grislis and Cimone Nunley re Motion in Limine witness decs.
3/31/2020	Navruz Avloni	Other	0.2	Located witness jeff henry; search. Email to team with findings.
4/2/2020	Navruz Avloni	Review/ Analyze	0.1	Rev'd orders and filings from today, email to Sabrina Grislis re calendaring.
4/2/2020	Navruz Avloni	Communication	0.1	Email to/from Sabrina Grislis re witnesses.
4/3/2020	Navruz Avloni	Review/ Analyze	0.1	Rev'd witness list.
4/3/2020	Navruz Avloni	Communication	0.1	Email to Sabrina Grislis and Cimone Nunley re witness.
4/3/2020	Navruz Avloni	Communication	0.1	Email to team re witnesses, subpoenas.
4/3/2020	Navruz Avloni	Communication	0.1	Email to from investigator Stu Kohler re witness Jeff Henry
4/3/2020	Navruz Avloni	Communication	0.2	Phone call with Larry Organ regarding witness information
4/3/2020	Navruz Avloni	Communication	0.2	Phone call with Larry Organ, Cimone Nunley, and Sabrina Grislis regarding witness information for trial subpoenas
4/5/2020	Navruz Avloni	Communication	0.1	Email to/from Stu re witness location.
4/5/2020	Navruz Avloni	Communication	0.1	Email to team re emotional distress
4/6/2020	Navruz Avloni	Communication	0.1	Email to/from team re emotional distress
4/6/2020	Navruz Avloni	Communication	0.1	Phone call with Larry Organ, Cimone Nunley, and Sabrina Grislis regarding status of case
4/7/2020	Navruz Avloni	Communication	0.6	Call w/ Cimone Nunley and Larry Organ re pretrial strategy and to-do list
4/8/2020	Navruz Avloni	Communication	0.1	Telephone meeting with Larry Organ, Cimone Nunley, and Sabrina Grislis regarding tasks
4/10/2020	Navruz Avloni	Communication	0.5	Telephone meeting with Larry Organ, Bernard Alexander, Cimone Nunley, and Susan Organ to discuss trial tasks and strategy
4/11/2020	Navruz Avloni	Draft/ Revise	2	Revised joint disputed section of joint pretrial statement.
4/12/2020	Navruz Avloni	Draft/ Revise	0.6	Revised jury instruction no. 10.
4/12/2020	Navruz Avloni	Review/ Analyze	1.5	Rev'd joint jury instructions.
4/13/2020	Navruz Avloni	Communication	0.1	Email to Sabrina Grislis re instructions for setting friday's meeting re strategy.
4/15/2020	Navruz Avloni	Communication	0.1	Email to team re meeting.

Date	User	Activity	Time	Description
4/15/2020	Navruz Avloni	Communication	0.1	Email to/from Stu re Jeffrey Henry
4/15/2020	Navruz Avloni	Communication	0.2	Phone call with Larry Organ regarding section 1981 standards
4/16/2020	Navruz Avloni	Meet	1	Met with Larry Organ and Cimone Nunley to discuss strategy, themes, strong facts, weak facts, law, jury instructions, agenda for tomorrow's call with Harry Plotkin, etc.
4/16/2020	Navruz Avloni	Other	1.6	Rev'd atty-work product notes, demonstratives, case law, prepared chart for tomorrow's team meeting.
4/17/2020	Navruz Avloni	Review/ Analyze	0.1	Rev'd stip re Motions in Limine.
4/17/2020	Navruz Avloni	Communication	0.1	Email to Harry and Bernard re today's meeting agenda, etc.
4/17/2020	Navruz Avloni	Review/ Analyze	0.2	Rev'd Foster MIL, email to Cimone Nunley re minor edits.
4/17/2020	Navruz Avloni	Meet	2.1	Meeting with team re strategy, themes, demonstratives.
4/20/2020	Navruz Avloni	Review/ Analyze	0.1	Reviewed juror questionnaire
4/21/2020	Navruz Avloni	Communication	0.1	Phone call with Larry Organ regarding timing in the case
4/22/2020	Navruz Avloni	Communication	0.1	Call w/ Larry Organ and Cimone Nunley re jury instructions.
5/6/2020	Navruz Avloni	Communication	0.1	Email to Cimone Nunley re Friday meeting with team.
5/11/2020	Navruz Avloni	Communication	0.2	Call w/ Cimone Nunley re Diaz Motion in Limine rulings, trial date.
5/18/2020	Navruz Avloni	Communication	0.1	Email to Sabrina Grislis re updating calendar with new trial date.
5/22/2020	Navruz Avloni	Review/ Analyze	0.1	Rev'd order re Motions in Limine.
5/22/2020	Navruz Avloni	Communication	0.7	Call w/ Larry Organ and Bernard Alexander re Motion in Limine rulings and strategy.
5/27/2020	Navruz Avloni	Communication	0.1	Email to/from Harry Plotkin re trial date.
6/4/2020	Navruz Avloni	Communication	0.1	Email to Susan Organ re concept Black rights don't matter at Tesla
6/9/2020	Navruz Avloni	Communication	0.1	Email to/from team re next meeting time/date.
6/9/2020	Navruz Avloni	Communication	0.1	Rev'd email from Sabrina Grislis to/from Larry Organ re availability, email to team with meeting time, instructions to Sabrina Grislis re setting up meeting.
6/24/2020	Navruz Avloni	Review/ Analyze	0.1	Rev'd Tesla's case management statement.
6/25/2020	Navruz Avloni	Communication	0.1	Email to/from Bernard re focus group.

Date	User	Activity	Time	Description
6/30/2020	Navruz Avloni	Communication	0.1	Email to team re zoom trial.
7/20/2020	Navruz Avloni	Communication	0.1	Rev'd email from Harry Plotkin re focus groups, email to Larry Organ, Cimone Nunley, Bernard Alexander re focus group planning.
7/24/2020	Navruz Avloni	Communication	0.1	Email to/from Harry Plotkin re focus group.
7/31/2020	Navruz Avloni	Communication	0.1	Discuss meet and confer letter with Cimone Nunley
8/5/2020	Navruz Avloni	Communication	0.1	Call w/ Larry Organ re focus group.
8/5/2020	Navruz Avloni	Review/ Analyze	0.1	Rev'd power point slides.
8/5/2020	Navruz Avloni	Communication	0.1	Rev'd emails re focus group planning.
8/6/2020	Navruz Avloni	Meet	1.3	Trial/Focus Group planning with Mika, Harry, Cimone Nunley, Sabrina Grislis, Larry Organ, Susan Organ
8/10/2020	Navruz Avloni	Communication	0.1	Email to Cimone Nunley and Larry Organ re meet and confer deadline.
8/15/2020	Navruz Avloni	Appearance/ Attend	4	Focus Group
8/15/2020	Navruz Avloni	Meet	0.9	Post focus group meeting and debrief with Harry Plotkin, and trial team
8/17/2020	Navruz Avloni	Review/ Analyze	0.1	Rev'd Harry's notes re focus group; email to Cimone Nunley re notes.
8/17/2020	Navruz Avloni	Communication	0.1	Rev'd Bernard Alexander's email re nextSource powerpoint; email to Cimone Nunley.
8/17/2020	Navruz Avloni	Communication	0.1	Call w/ Larry Organ re strategy/focus group.
8/17/2020	Navruz Avloni	Meet	0.2	Team Meeting
8/19/2020	Navruz Avloni	Meet	1.6	Meet with Harry Plotkin and trial team to discuss themes and strategy post focus group
8/20/2020	Navruz Avloni	Review/ Analyze	0.1	Rev'd Harry Plotkin's questionnaire; email to Harry re outstanding issues.
8/24/2020	Navruz Avloni	Review/ Analyze	0.1	Rev'd order from court re pretrial dates - request to Sabrina Grislis to adjust calendar.
8/30/2020	Navruz Avloni	Communication	0.1	Rev'd email from Harry Plotkin re trial setting conference questions, responded to email, added questions to calendar entry; added Bernard to calendared event.
9/1/2020	Navruz Avloni	Communication	0.1	Emailed Court info re appearance for trial setting conference.
9/23/2020	Navruz Avloni	Communication	0.1	Phone call with Larry Organ, Cimone Nunley, and Sabrina Grislis regarding the settlement conference
9/30/2020	Navruz Avloni	Communication	0.1	Email from/to Harry re update on case.



Date	User	Activity	Time	Description
10/22/2020	Navruz Avloni	Communication	0.2	Discussed strategy and upcoming team meeting with Cimone Nunley
10/23/2020	Navruz Avloni	Meet	0.9	Team meeting re themes, trial related issues, etc.
11/2/2020	Navruz Avloni	Meet	1	Meeting with Larry, Bernard and Cimone re trial theme.
11/12/2020	Navruz Avloni	Communication	0.4	Telephone call with Larry Organ regarding trial prep
1/15/2021	Navruz Avloni	Communication	0.1	Rev'd Tesla's case management statement, email to Sabrina Grislis re P's case management statement.
2/17/2021	Navruz Avloni	Review/ Analyze	0.2	Reviewed and revised stip to continue trial.
6/18/2021	Navruz Avloni	Communication	0.1	Email from/to Bernard re team meeting.
7/19/2021	Navruz Avloni	Other	1.7	meeting with Client, Cimone Nunley, Susan, Larry and Sabrina re client update, emotional distress, lost wages.
8/16/2021	Navruz Avloni	Meet	4.2	Meet with team to prepare for trial - discussed witnesses, strategy, defenses, key points for each witness, which witnesses not to include, etc.
8/26/2021	Navruz Avloni	Review/ Analyze	0.1	Rev'd Sabrina Grislis's email to clt re depo prep; added dates to calendar.
8/26/2021	Navruz Avloni	Communication	0.1	Rev'd email from Sabrina Grislis re focus group, emailed payment info and next steps.
9/4/2021	Navruz Avloni	Other	0.4	Assisted with feedback re focus group presentation.
9/4/2021	Navruz Avloni	Draft/ Revise	0.5	Reviewed and revised Larry's script for focus group - our story.
9/4/2021	Navruz Avloni	Draft/ Revise	2.1	Revised moderator's script for focus group; drafted/revised Tesla's position statement for focus group.
9/5/2021	Navruz Avloni	Draft/ Revise	0.8	Revised Larry's script for afternoon focus group, adjusted' Tesla's position statement.
9/5/2021	Navruz Avloni	Appearance/ Attend	4.1	Focus group: appear, assist, participate.
9/5/2021	Navruz Avloni	Meet	0.4	Meet with Larry Organ, Cimone Nunley, Sabrina Grislis, and Susan Organ after focus groups to debrief
9/9/2021	Navruz Avloni	Review/ Analyze	0.7	Reviewed decs for Maggie Crosby complaints. Email to team re locating complaints.
9/9/2021	Navruz Avloni	Other	0.1	calendared trial related deadlines.
9/9/2021	Navruz Avloni	Other	0.1	Discussed urgent trial related tasks with Larry. Sent email to team re same.
9/10/2021	Navruz Avloni	Communication	0.1	Email to/from Amy Oppenheimer re trial prep.
9/10/2021	Navruz Avloni	Plan/ Prepare	1.3	Met with Cimone Nunley, Larry Organ, Bernard Alexander, Sabrina Grislis re trial prep
9/11/2021	Navruz Avloni	Communication	0.1	Email to/from Larry Organ re robert hurtado



Date	User	Activity	Time	Description
9/12/2021	Navruz Avloni	Research	0.1	Researched Robert Hortado; saved findings in key docs.
9/12/2021	Navruz Avloni	Draft/ Revise	0.5	Reviewed, revised and provided ideas re Dr. Reading direct.
9/12/2021	Navruz Avloni	Draft/ Revise	2.4	revised opening statement
9/13/2021	Navruz Avloni	Plan/ Prepare	0.1	Email to team re me too prep.
9/13/2021	Navruz Avloni	Plan/ Prepare	0.2	Met with Amy Oppenheimer re trial.
9/13/2021	Navruz Avloni	Review/ Analyze	0.6	Rev'd and analyzed updated exhibit list; email to Larry, Cimone and Bernard about issues, areas to focus on in opp/cross/direct, thoughts.
9/13/2021	Navruz Avloni	Plan/ Prepare	2.2	Prepared for logistics call with Amy Oppenheimer; reviewed depo trans w/ issues pull; reviewed Amy's report; prepared direct outline
9/14/2021	Navruz Avloni	Communication	0.4	Reviewed witness list; sent team thoughts on several witnesses; discussion with Larry Organ re strategy.
9/15/2021	Navruz Avloni	Communication	0.1	Emailed Amy Oppenheimer re upcoming meeting, and excerpts.
9/15/2021	Navruz Avloni	Review/ Analyze	0.5	Reviewed LaDrea Jones' transcript; analyzed; emailed team thoughts.
9/19/2021	Navruz Avloni	Other	0.1	researched erin marconi miller.
9/19/2021	Navruz Avloni	Plan/ Prepare	0.7	Trial witness prep - reviewed Amy Oppenheimer's investigation and notes; drafted outline.
9/19/2021	Navruz Avloni	Communication	0.5	Discussion with Larry Organ regarding expert Amy Oppenheimer's outline
9/20/2021	Navruz Avloni	Other	2	Media outreach.
9/20/2021	Navruz Avloni	Draft/ Revise	3.9	Finished preparing direct for Amy Oppenheimer. ; reviewed and analyzed report and info in transcript.
9/21/2021	Navruz Avloni	Communication	0.1	Call w/ Helene from West valley staffing re witness testimony.
9/21/2021	Navruz Avloni	Plan/ Prepare	0.3	Prepared Amy Oppenheimer for her examinaiton.
9/21/2021	Navruz Avloni	Communication	0.1	Discussed with Cimone Nunley witness logistics - id/vaccination.
9/21/2021	Navruz Avloni	Communication	0.1	Message to Amy Oppenheimer re zoom meeting.
9/21/2021	Navruz Avloni	Draft/ Revise	1	Reviewed jury instruction; email to/from Amy Oppenheimer re adjusting prep time; researched/briefed issue re disc designations by non-parties, and using Jones and Lambert.

Date	User	Activity	Time	Description
9/22/2021	Navruz Avloni	Plan/ Prepare	5	Watched opening statement and provided feedback, edits; discussed strategy with Larry, discussed 3 mini briefs with Larry; reviewed discovery designation related to mini brief; reviewed nigel jones dec and testimony related to mini brief. discussed mini brief strategy with Cimone Nunley.
9/22/2021	Navruz Avloni	Research	5.6	Juror background research; discussion with Larry Organ, Bernard Alexander and Susan Organ voir dire and potential jurors.
9/23/2021	Navruz Avloni	Research	2.2	Further research on prospective jurors. Updated team on research.
9/23/2021	Navruz Avloni	Communication	0.6	Discussion with Cimone, Harry, Larry, Bernard re jury instructions.
9/23/2021	Navruz Avloni	Review/ Analyze	0.5	Rev'd tesla's briefing re using discovery of third party entities; drafted response, discussed with Larry Organ, emailed Sabrina Grislis for filing.
9/23/2021	Navruz Avloni	Review/ Analyze	0.4	Further research on prospective jurors.
9/24/2021	Navruz Avloni	Draft/ Revise	3.4	Rev'd Motion in Limine related to nigel jones, reviewed court's ruling re nigel jones mil, researched admissibility of nigel jones testimony, drafted brief re admissibility of nigel jones testimony.
9/24/2021	Navruz Avloni	Appearance/ Attend	7	Trial - travel to/from Diaz trial appear for voir dire
9/25/2021	Navruz Avloni	Plan/ Prepare	2.8	DIAZ - assisted with opening statement prep
9/25/2021	Navruz Avloni	Meet	0.7	Meeting with Amy Oppenheimer and Larry re demonstratives, testimony, outline, etc.
9/25/2021	Navruz Avloni	Review/ Analyze	0.7	Pulled exhibits for Amy Oppenheimer with trial, rather than exhibit stamps.
9/25/2021	Navruz Avloni	Review/ Analyze	0.3	Rev'd media articles, pulled Diaz excerpts for depo prep.
9/26/2021	Navruz Avloni	Plan/ Prepare	2	Amy Oppenheimer: reviewed powerpoint and report outline; discussion with Larry and Cimone; revised powerpoint and report outline, added trial exhibits; emailed back to Amy.
9/27/2021	Navruz Avloni	Other	6.5	Diaz Trial - Day 1; appear (5); travel t/from (1.5)
9/27/2021	Navruz Avloni	Draft/ Revise	1.2	Demetric Diaz: Analyzed counter designations and objections made by Tesla; reviewed Demetric's transcript; reviewed court's Motion in Limine ruling on this issue; discussed strategy with LO; drafted P's response to Tesla's designations and objections.
9/27/2021	Navruz Avloni	Communication	0.5	Discuss trial strategy with Emily Kohlheim
9/27/2021	Navruz Avloni	Communication	0.6	Phone conference with Larry Organ, Sabrina Grislis, Bernard Alexander, and Cimone Nunley to debrief, discuss strategy, and tasks
9/28/2021	Navruz Avloni	Appearance/ Attend	6.5	Appeared in court (5); travel to/from (1.5)

Date	User	Activity	Time	Description
9/28/2021	Navruz Avloni	Plan/ Prepare	0.7	Worked on closing argument: outlined team notes - sabrina, susan, cimone's, etc.
9/29/2021	Navruz Avloni	Appearance/ Attend	6	appeared for trial; drive to/from
9/29/2021	Navruz Avloni	Plan/ Prepare	1	began working on closing powerpoint.
9/29/2021	Navruz Avloni	Plan/ Prepare	0.4	Assisted with prep for lamar patterson direct.
9/29/2021	Navruz Avloni	Plan/ Prepare	2	Worked on closing argument powerpoint slide.
9/30/2021	Navruz Avloni	Appearance/ Attend	5.5	Attended trial, drive to/from, discussed strategy w/ team, assisted with witness prep.
9/30/2021	Navruz Avloni	Draft/ Revise	6	Revised closing statement slides, pulled material, etc.
9/30/2021	Navruz Avloni	Meet	2.2	Meet with Larry Organ, Bernard Alexander, Cimone Nunley, Sabrina Grislis, and Susan Organ to discuss remaining tasks and strategy
10/1/2021	Navruz Avloni	Appearance/ Attend	4	Appeared for trial, discussed strategy, drive to/from trial.
10/1/2021	Navruz Avloni	Meet	3	Meeting with Larry, Cimone, Bernard and Susan re closing argument power point slides.
10/1/2021	Navruz Avloni	Communication	0.3	Discussed trial strategy with susan organ.
10/1/2021	Navruz Avloni	Draft/ Revise	2	revised and drafted additional closing slides.
10/2/2021	Navruz Avloni	Draft/ Revise	7	Drafted opp to tesla's motion to strike Mahla dec, prepared my dec, prepared exhibits, researched legal and factual issues, reviewed mahla's report and prior transcript, as well as trial testimony.
10/2/2021	Navruz Avloni	Meet	0.7	Met to discuss closing powerpoint slides and strategy with Cimone Nunely and Susan Organ
10/2/2021	Navruz Avloni	Draft/ Revise	2	Worked on closing powerpoint slides.
10/2/2021	Navruz Avloni	Meet	0.2	Meet with Larry Organ to discuss our opposition to defendant's motion to strike the testimony of Charles Mahla
10/3/2021	Navruz Avloni	Draft/ Revise	0.8	Revised and finalized opposition to Defendant's motion to strike Charles Mahla's testimony; merged and finalized exhibits for filing.
10/3/2021	Navruz Avloni	Draft/ Revise	1.5	Prepared Ramon Martinez and Robert Hurtado supervisor slides - reviewed and pulled exhibits, reviewed relevant testimony for the closing PowerPoint
10/3/2021	Navruz Avloni	Draft/ Revise	0.2	Reviewed La'Drea Jones' trial transcript and created slide for the closing powerpoint.
10/3/2021	Navruz Avloni	Review/ Analyze	0.2	Reviewed Jackelin Delgado Smith trial transcript for content for closing Powerpoint.

Date	User	Activity	Time	Description
10/3/2021	Navruz Avloni	Communication	0.4	Jumped into discussion with Bernard Alexander and Larry Organ and Susan Organ regarding rebuttal, and discussed exhibit 106 with Larry Organ and Susan Organ subsequently.
10/3/2021	Navruz Avloni	Plan/ Prepare	3.5	Reviewed Ramon Martinez's testimony for closing argument; met with Cimone Nunley, Sabrina Grislis, Larry Organ, and Susan Organ regarding rebuttal. Prepared rebuttal arguments, typed up notes from meeting and sent to Susan Organ so she can prepare final rebuttal slides, searched for quotes for rebuttal slides.
10/3/2021	Navruz Avloni	Meet	0.1	Discussed Jackelin Delgado Smith's trial transcript content for use in closing PowerPoint with Larry Organ
10/4/2021	Navruz Avloni	Appearance/ Attend	6.5	Appeared in court for closing and voir dire; assisted with pickup, etc. Travel to and from court
10/6/2021	Navruz Avloni	Communication	0.1	Telephone call with Larry Organ regarding motion fee research
10/7/2021	Navruz Avloni	Communication	0.2	Discussion with Larry Organ regarding appeal and other issues
10/8/2021	Navruz Avloni	Review/ Analyze	0.1	Reviewed judgment; sent email to Cimone Nunley regarding edits.
10/11/2021	Navruz Avloni	Paralegal	0.1	Set up zoom call for meeting with Michael Rubin.
10/12/2021	Navruz Avloni	Meet	1	Meet with Michael Rubin, Jonathan Rosenthal, Larry Organ, Cimone Nunley, and Sabrina Grislis regarding next steps of Diaz case in preparation for appeal (left early)
10/22/2021	Navruz Avloni	Research	0.8	Researched post-judgment interest on attorney fees - and when interest begins to accrue. Emailed summary to team.
11/2/2021	Navruz Avloni	Review/ Analyze	0.7	Rev'd and revised Bill of Costs, and supporting Nunley declaration.
11/2/2021	Navruz Avloni	Communication	0.1	Discussed bill of costs with Cimone, edits re deposition costs.
11/18/2021	Navruz Avloni	Research	1.3	Reviewed Tesla's post trial brief; researched cases related to punitive damages and ed damages, analyzed Exxon case, 10th circuit case re comparisons, and searched for high punitive damages ratio cases.
11/18/2021	Navruz Avloni	Meet	1.3	Meeting with Larry Organ, Cimone Nunley, Bernard, Michael, Jono regarding Diaz's post trial brief, strategy, delegated work.
11/23/2021	Navruz Avloni	Review/ Analyze	0.9	Reviewed punitive damages and emotional distress cases.
11/24/2021	Navruz Avloni	Appearance/ Attend	0.7	Meeting re post trial brief strategy with cimone, larry, michael, jono, sabrina and bernard.
12/6/2021	Navruz Avloni	Draft/ Revise	5.5	Drafted request for judicial notice re widespread media dissemination; researched relevant case law related to issue; researched and pulled up 20 publications.
12/7/2021	Navruz Avloni	Draft/ Revise	0.2	Revised RJN, and discussed attachments with Sabrina.

Date	User	Activity	Time	Description
1/14/2022	Navruz Avloni	Appearance/ Attend	1	Oral arg practice session.

Date	User	Activity	Time	Description
11/27/2017	Noah Baron	Research	0.4	Research removability regarding section 1981 claims.
12/1/2017	Noah Baron	Research	0.9	Research the deadlines relating to removal from state to federal court.
12/1/2017	Noah Baron	Research	1.1	Research damages relating to Unruh, section 1981, and Ralph Act claims.
5/10/2018	Noah Baron	Other	0.2	Provide tech support to Navruz Avloni during the deposition prep of client Owen Diaz.
5/22/2018	Noah Baron	Plan/ Prepare	0.5	Prepare documents in preparation for the deposition of Owen Diaz.
6/4/2018	Noah Baron	Research	0.4	Research regarding section 1981 claims.
6/4/2018	Noah Baron	Research	0.8	Conflict research
6/6/2018	Noah Baron	Review/ Analyze	0.3	Review the deposition footage.
6/8/2018	Noah Baron	Meet	0.4	Meeting with Ramzi Nimr regarding Owen Diaz's deposition
10/9/2018	Noah Baron	Research	0.5	Research section 1981 jury instructions.
10/16/2018	Noah Baron	Research	1.1	Research regarding section 1981, joint employer, and duty to prevent.
10/26/2018	Noah Baron	Draft/ Revise	1	Draft a meet and confer letter regarding the subpoenas to Owen Diaz's current employers.
10/26/2018	Noah Baron	Research	1.8	Research regarding federal privacy right in discovery; draft meet and confer letter.
10/29/2018	Noah Baron	Draft/ Revise	1	Research and draft meet and confer letter to Defendants Tesla and Citistaff subpoenas for Plaintiffs' current employment records.
10/29/2018	Noah Baron	Draft/ Revise	0.3	Further draft and revise the meet and confer letter to Tesla regarding its subpoenas to Plaintiffs.
10/29/2018	Noah Baron	Meet	0.1	Discuss feedback on meet and confer letter with Cady Sartorius
10/30/2018	Noah Baron	Draft/ Revise	0.8	Revise the meet and confer letters regarding the subpoenas to Plaintiffs' subsequent employers
10/30/2018	Noah Baron	Communication	0.1	Calls to subpoena recipients not to produce pending conflict resolution
10/30/2018	Noah Baron	Communication	0.1	Communications with Navruz Avloni regarding contacting subpoenaed employers and Wheels of Justice to give notice of our objection.
10/30/2018	Noah Baron	Meet	0.1	Meet with Larry Organ regarding the meet and confer letter about Defendant Citistaff's subpoena to AC transit.
10/30/2018	Noah Baron	Draft/ Revise	0.4	Revise the meet and confer letter to Defendant Citistaff's subpoena to AC Transit.
10/30/2018	Noah Baron	Communication	0.1	Emails to Wheels of Justice, AC Transit, Glazier Steel, and Alamillo Rebar regarding Plaintiffs' notice of objection to subpoenas and instruction not to produce.

Date	User	Activity	Time	Description
10/30/2018	Noah Baron	Communication	0.2	Emails and call Wheels of Justice and AC Transit regarding Plaintiff's notice of objection and instruction not to produce.
10/30/2018	Noah Baron	Review/ Analyze	0.3	Review previous discovery requests and responses for information for meet and confer letter
10/30/2018	Noah Baron	Communication	0.1	Call with Owen Diaz regarding current employer and employment status
10/30/2018	Noah Baron	Communication	0.1	Emails to Navruz Avloni regarding the meet and confer letters.
10/31/2018	Noah Baron	Communication	0.1	Call with AC Transit regarding instruction not to produce documents responsive to subpoena pending parties' resolution.
10/31/2018	Noah Baron	Communication	0.4	Call with counsel for Defendants Tesla and Citistaff regarding meet and confer efforts relating to subpoenas to Plaintiffs' subsequent employers (0.5); call with client regarding current employment (0.2).
10/31/2018	Noah Baron	Research	0.3	research for meet & confer efforts re third party motion to quash on privacy and relevance grounds
11/1/2018	Noah Baron	Review/ Analyze	0.1	Review emails and call summaries of meet and confer efforts with counsel for Defendants Citistaff and Tesla.
11/2/2018	Noah Baron	Communication	0.4	Call w opp counsel re meet & confer on subpoenas; meet w Larry Organ & Cimone Nunley re new discovery requests
11/5/2018	Noah Baron	Review/ Analyze	0.1	Review of Defendant Tesla's notice of continued depo of Demetric Di-az
11/5/2018	Noah Baron	Review/ Analyze	0.1	Review of Defendant Tesla's notice of continued depo of Owen Diaz
11/9/2018	Noah Baron	Review/ Analyze	0.1	Review emails between Larry Organ and opposing counsel regarding scheduling depositions.
11/12/2018	Noah Baron	Draft/ Revise	0.4	Research and draft response email to opposing counsel regarding third party subpoenas
11/12/2018	Noah Baron	Communication	0.1	Review of emails from opposing counsel regarding Plaintiffs' objections to third party subpoenas
11/20/2018	Noah Baron	Draft/ Revise	1	Draft a discovery dispute letter regarding Defendant's subpoenas.
11/21/2018	Noah Baron	Communication	0.1	Call to AC Transit counsel regarding discovery dispute as to subpoena
11/21/2018	Noah Baron	Draft/ Revise	0.3	Reviewed Cimone Nunley's changes to the joint discovery dispute brief; make revisions to brief.
11/26/2018	Noah Baron	Communication	0.1	Review of email from opposing counsel; draft and send reply.
11/27/2018	Noah Baron	Communication	0.1	Email with opposing counsel regarding status of dispute letter
12/10/2018	Noah Baron	Meet	0.2	Meet with Larry Organ and Navruz Avloni regarding West Valley PMK depo prep
12/10/2018	Noah Baron	Review/ Analyze	2.7	Review of initial document disclosures and discovery; prepare for the deposition of Defendant West Valley's PMK.
12/14/2018	Noah Baron	Meet	0.4	Assisted Sabrina Grislis with filing the joint stipulation to continue the trial and amend the complaint via ECF.

Date	User	Activity	Time	Description
1/2/2019	Noah Baron	Review/ Analyze	0.1	Review of news article regarding Tesla's HR department
1/2/2019	Noah Baron	Review/ Analyze	0.1	Review team emails regarding Tesla in the news
1/2/2019	Noah Baron	Meet	0.2	Meet with Cimone Nunley regarding discovery
1/9/2019	Noah Baron	Review/ Analyze	0.1	Review emails between Plaintiffs' counsel and opposing counsels.
1/22/2019	Noah Baron	Meet	0.1	team meeting
3/27/2019	Noah Baron	Meet	0.1	team meeting
4/17/2019	Noah Baron	Meet	0.1	team mtg
5/22/2019	Noah Baron	Meet	0.1	team mtg



Date	User	Activity	Time	Description
1/23/2023	Molly Durkin	Communication	0.8	call with counsel re PMK at trial
1/23/2023	Molly Durkin	Research	0.8	research re PMK testimony at trial
2/2/2023	Molly Durkin	Meet	0.2	call w counsel re MIL
2/2/2023	Molly Durkin	Draft/ Revise	0.6	revising MIL footnote
2/6/2023	Molly Durkin	Communication	0.1	call with Marqui Hood re punitive damages scope briefing
2/7/2023	Molly Durkin	Draft/ Revise	6.6	briefing re punitive damages liability
2/8/2023	Molly Durkin	Communication	0.7	call with Marqui re punitive damages briefing
2/8/2023	Molly Durkin	Draft/ Revise	3.3	drafting briefing re punitive damages
2/16/2023	Molly Durkin	Communication	0.1	Strategy call with Larry & Marqui
2/22/2023	Molly Durkin	Communication	0.1	Call w/ Marqui
2/22/2023	Molly Durkin	Communication	0.4	call w/ Marqui re reference to "jury trial" in joint pretrial statement
2/23/2023	Molly Durkin	Communication	0.3	call w Marqui re pretrial briefing
2/23/2023	Molly Durkin	Communication	0.2	call with Marqui and Cimone re pretrial briefing
2/23/2023	Molly Durkin	Communication	0.4	call with Marqui re pretrial briefing
2/23/2023	Molly Durkin	Research	2.9	Research re pretrial briefing re reference to first trial
2/23/2023	Molly Durkin	Communication	0.2	call with Marqui re briefing on reference to first trial
2/23/2023	Molly Durkin	Draft/ Revise	1.6	Draft/revise briefing re reference to prior trial
2/24/2023	Molly Durkin	Research	0.3	Research re mention of prior trial issue
2/24/2023	Molly Durkin	Draft/ Revise	0.6	Review/Revise/Research re briefing on reference to prior trial
2/27/2023	Molly Durkin	Communication	0.1	Call with Marqui re strategy
2/27/2023	Molly Durkin	Communication	0.2	call w/ Marqui re strategy
3/2/2023	Molly Durkin	Communication	0.5	call with co counsel re strategy on MIL
3/2/2023	Molly Durkin	Review/ Analyze	0.2	Reviewing transcripts re feces incident

Date	User	Activity	Time	Description
3/2/2023	Molly Durkin	Review/ Analyze	0.1	Reviewing order on pretrial conference
3/2/2023	Molly Durkin	Draft/ Revise	0.7	preparing filing re feces incident
3/3/2023	Molly Durkin	Draft/ Revise	0.1	Review/revise submission re feces incident
3/10/2023	Molly Durkin	Research	0.2	Research re HR Manager
3/22/2023	Molly Durkin	Communication	0.2	call w/ Marqui re juror research
3/22/2023	Molly Durkin	Research	0.8	Potential juror research
3/24/2023	Molly Durkin	Review/ Analyze	0.2	Reviewing Tesla's objection to demonstratives
3/24/2023	Molly Durkin	Communication	0.1	Call with Marqui Hood re Tesla's objection to demonstratives
3/24/2023	Molly Durkin	File/ Serve	0.7	Revise and file admin motion to bring equipment into courtroom
3/24/2023	Molly Durkin	File/ Serve	0.3	Filing response to objection to Oppenheimer slides and testimony
3/24/2023	Molly Durkin	File/ Serve	0.1	Filing response to objections to jury instructions
3/26/2023	Molly Durkin	Communication	0.1	Call with Marqui re legal research
3/29/2023	Molly Durkin	Draft/ Revise	0.3	Trial brief re objection to cross exam of Diaz
3/30/2023	Molly Durkin	Draft/ Revise	4.6	Legal research and drafting mtn for mistrial
4/5/2023	Molly Durkin	Meet	1.2	Meet with Larry, Cimon, Marqui, Bernard Alexander, Michael Ruben, Jono Rosenthal, Dustin Collier re strategy
4/5/2023	Molly Durkin	Research	0.8	Gather press clippings
6/27/2023	Molly Durkin	Draft/ Revise	1.7	Reviewing cites in reply brief re Motion for New Trial
6/28/2023	Molly Durkin	Draft/ Revise	0.5	Review/edit reply brief to Motion for New Trial
8/16/2023	Molly Durkin	Review/ Analyze	2.1	Reviewing briefing and record re: Tesla response to notice of new evidence
8/16/2023	Molly Durkin	Meet	0.5	Meeting re Tesla's response to Notice of new Evidence
8/16/2023	Molly Durkin	Communication	0.2	Call with Marqui re briefing re new evidence
8/16/2023	Molly Durkin	Draft/ Revise	6.6	Drafting reply re Plaintiff's Notice of New Evidence ISO motion for retrial
8/17/2023	Molly Durkin	Communication	0.4	Email to M Rubin, L Organ, B. Alexander, M. Hood, C. Nunley, J. Rosenthal re draft reply brief ISO notice of new evidence

<b>Date</b>	<b>User</b>	<b>Activity</b>	<b>Time</b>	<b>Description</b>
8/17/2023	Molly Durkin	Communication	0.1	Call with MH re reply briefing re Notice of New Evidence
8/17/2023	Molly Durkin	Communication	0.1	Call with Marqui re reply briefing
8/17/2023	Molly Durkin	Communication	0.2	Call with Marqui re reply brief
8/17/2023	Molly Durkin	Draft/ Revise	0.9	Drafting/editing reply brief re notice of additional evidence
8/18/2023	Molly Durkin	Draft/ Revise	0.2	Review/edit Reply re: Notice of New Evidence
8/18/2023	Molly Durkin	Draft/ Revise	0.9	Review/revise admin motion to file under seal
8/18/2023	Molly Durkin	Communication	0.1	Email to team re Admin Motion to File Under Seal

Date	User	Activity	Time	Description
10/18/2019	Teodora Gagauz	File/ Serve	0.3	Serve deposition notice of Erin Marconi
10/18/2019	Teodora Gagauz	Communication	0.2	Call with Jean Ger to receive instructions for serving the deposition notice of Erin Marconi
10/21/2019	Teodora Gagauz	Communication	0.1	Call with Cimone Nunley requesting I scan and email the Proof of Service regarding the Marconi deposition
3/3/2020	Teodora Gagauz	Paralegal	0.2	Assist Sabrina Grislis with preparing the chambers copies of the stipulation
6/2/2020	Teodora Gagauz	Draft/ Revise	1.1	Calculate the new pretrial deadlines using the new trial date
6/3/2020	Teodora Gagauz	Communication	0.2	verify pre trial DL's; send email to Cimone Nunley and Sabrina Grislis;
6/11/2020	Teodora Gagauz	Communication	0.1	communication w Cimone Nunley re pre trial DL's; update task list.
6/17/2020	Teodora Gagauz	Communication	0.1	communication with Sabrina Grislis re Pre Trial DL
6/22/2020	Teodora Gagauz	Draft/ Revise	0.9	remove old pre trial DL's; add new ones to calendar
9/17/2021	Teodora Gagauz	Postage/Delivery	0.3	create and print FedEx label for Debra Pas CRR to send pretrial hearing transcripts
9/21/2021	Teodora Gagauz	Communication	0.1	call with Helene A. Simvoulakis; communications with Navruz Avloni re same
9/28/2021	Teodora Gagauz	Travel Expense	2	travel to/ from courthouse
10/11/2021	Teodora Gagauz	Paralegal	0.3	Create FedEx package for Michael Rubin
10/11/2021	Teodora Gagauz	Postage/Delivery	0.2	FedEx drop off, package to Michael Rubin.
7/25/2022	Teodora Gagauz	Plan/ Prepare	0.1	updated the calendar re new trial date and communications with Sabrina Grislis re same
12/21/2022	Teodora Gagauz	Appearance/ Attend	3.1	ED focus Group and Debrief
2/14/2023	Teodora Gagauz	Meet	1.1	meet with Sabrina Grislis and Cameron Hartquist re focus group
2/16/2023	Teodora Gagauz	Appearance/ Attend	3.3	Diaz focus group
2/20/2023	Teodora Gagauz	Communication	0.2	received email from Larry Organ re date of the next focus group and discussed with Cameron Hartquist next steps
2/20/2023	Teodora Gagauz	Paralegal	0.1	updated the focus group time on the calendar
2/20/2023	Teodora Gagauz	Plan/ Prepare	0.8	stared prepping for the focus group 2/26; survey monkey add and logged in into all accounts; communications with Sabrina Grislis and Cameron Hartquist re same
2/20/2023	Teodora Gagauz	Plan/ Prepare	1	posted a craigslist ad for feb 26 focus group and created survey monkey link
2/20/2023	Teodora Gagauz	Review/ Analyze	0.2	reviewed focus group survey monkey responses for feb 26 focus group

Date	User	Activity	Time	Description
2/20/2023	Teodora Gagauz	Review/ Analyze	0.4	review survey monkey responses from craigslist ad and delete the incomplete
2/21/2023	Teodora Gagauz	Review/ Analyze	0.2	sorted the incomplete forms on survey monkey for 2/26 focus group
2/22/2023	Teodora Gagauz	Plan/ Prepare	0.5	saved the responses to Survey Monkey Craigslist posting in DB; deleted the Craiglist posts re same and communications with Cameron Hartquist re logistics
2/22/2023	Teodora Gagauz	Plan/ Prepare	0.4	reviewed the focus group responses to select participants and closed the focus group link in Survey Monkey
2/22/2023	Teodora Gagauz	Review/ Analyze	0.2	reviewed list saved by Cam for the focus group and highlighted the repeat participants
2/23/2023	Teodora Gagauz	Meet	0.4	meet with Cameron Hartquist and Sabrina Grislis re trial binders and pre-trial
2/23/2023	Teodora Gagauz	Plan/ Prepare	2.1	Prepared the MIL Binder for the pre-trial meeting
2/24/2023	Teodora Gagauz	Communication	0.2	with Cameron Hartquist re Focus Group Logistics
2/24/2023	Teodora Gagauz	Plan/ Prepare	0.2	created label for focus group gmail and updated the confidentiality agreement
2/24/2023	Teodora Gagauz	Paralegal	1.1	sent confidentiality agreements for the focus group
2/24/2023	Teodora Gagauz	Plan/ Prepare	0.2	sent agreements for the focus group and updated the doc
2/27/2023	Teodora Gagauz	Appearance/ Attend	5	prior and post focus group preparation and payments; attend the focus group and coordinating it with CH
2/27/2023	Teodora Gagauz	Review/ Analyze	0.2	reviewed survey monkey responses to post group survey
3/2/2023	Teodora Gagauz	Appearance/ Attend	1.7	attend focus group
3/20/2023	Teodora Gagauz	Communication	0.2	re in-office trial help strategy
3/22/2023	Teodora Gagauz	Plan/ Prepare	0.8	assembled exhibit binders
3/22/2023	Teodora Gagauz	Research	1.5	jury research and attending meeting re same
3/23/2023	Teodora Gagauz	Plan/ Prepare	1.4	assembled exhibit binders
3/23/2023	Teodora Gagauz	Meet	1.2	with Sabrina Grislis and Cameron Hartquist re trial directory videos
3/23/2023	Teodora Gagauz	Communication	0.3	with Sabrina Grislis and Cameron Hartquist re the focus group tasks and strategy
3/24/2023	Teodora Gagauz	Meet	1.4	trial directory with Sabrina Grislis; exhibit prep.
3/24/2023	Teodora Gagauz	Appearance/ Attend	4.1	courthouse trial arrangements
3/24/2023	Teodora Gagauz	Plan/ Prepare	1.1	called and confirmed focus group participants

Date	User	Activity	Time	Description
3/24/2023	Teodora Gagauz	Communication	0.5	called addl focus group participants
4/18/2023	Teodora Gagauz	Paralegal	0.1	added Cimone Nunley's travel expenses for trial

Date	User	Activity	Time	Description
12/17/2018	Jean Ger	Communication	0.1	Email to Kathy with Bridget Mattos and Associates regarding the cancelled deposition.
12/20/2018	Jean Ger	File/ Serve	0.2	Draft the proofs of service and serve Owen Diaz's responses to Defendant Citstaff's discovery request and Demetric Di-az responses to Defendant Tesla's discovery request.
3/14/2019	Jean Ger	File/ Serve	1.2	Finalize deposition notices, prepare proof of service, and serve via mail and email on opposing counsels.
4/3/2019	Jean Ger	Communication	0.1	Investigate Judy Timbreza on PeopleMap to search for address.
6/5/2019	Jean Ger	Deposition	1.2	depo prep - print docs for Titus McCaleb depo
6/12/2019	Jean Ger	Communication	0.1	call from saja re deponent status (Titus McCaleb)
6/21/2019	Jean Ger	Paralegal	0.2	send witness fee to deponent Titus, save to records
6/24/2019	Jean Ger	Communication	0.1	call w/ cimone re diaz discovery
6/24/2019	Jean Ger	File/ Serve	0.6	service - owen depo objs.
7/17/2019	Jean Ger	Paralegal	0.1	save pretrial order to file
9/16/2019	Jean Ger	Meet	0.1	Meet with team to discuss case status, trial planning and discovery
10/1/2019	Jean Ger	Meet	0.1	Team Meeting
10/3/2019	Jean Ger	Communication	0.1	call with Sabrina Grislis re fedex info
10/9/2019	Jean Ger	Draft/ Revise	0.7	Draft Trial Subp. and Standby Agreement - Kawasaki
10/9/2019	Jean Ger	Plan/ Prepare	0.2	print out protective order for today's depo, call from Cece re today's depo
10/9/2019	Jean Ger	Paralegal	0.2	credit card form for tomorrow's depo, confirm w Cimone Nunley, fax over and save to DB
10/9/2019	Jean Ger	Paralegal	0.1	upload standby agreement and trial subp. template to file
10/11/2019	Jean Ger	File/ Serve	0.6	serve expert disclosures
10/18/2019	Jean Ger	Communication	0.2	Call with Teodora Gagauz re instructions for service for today - Macroni deposition
10/18/2019	Jean Ger	Draft/ Revise	0.2	Review draft, Revise POS for Marconi Deposition - Send to Teodora Gagauz for service with labels
10/21/2019	Jean Ger	Review/ Analyze	0.1	Review Teodora Gagauz letter re NOD of Macroni
10/22/2019	Jean Ger	Meet	0.3	Meet - listen to Larry Organ practice of MSJ rebuttal for tomorrow's hearing
10/23/2019	Jean Ger	Meet	0.5	Meet re MSJ Hearing practice
10/29/2019	Jean Ger	Communication	0.2	Call with FedEx to receive settlement package
10/30/2019	Jean Ger	Deposition	0.1	send transcripts to Sabrina for saving (Delgado)
11/1/2019	Jean Ger	Meet	0.1	Team Meeting
12/3/2019	Jean Ger	Communication	0.1	Email to team re MSJ hearing reset, add to calendar
12/27/2019	Jean Ger	Meet	0.2	Team Meeting - Discuss needing to brainstorm MILs, discuss MSC statement, case strategy
3/23/2020	Jean Ger	Other	0.4	troubleshooting compressed file issue for trial exhibits with Sabrina Grislis
4/8/2020	Jean Ger	Communication	0.1	Send invoice to Sabrina Grislis for costs - Torreano reporting
9/17/2021	Jean Ger	Communication	0.1	Email to Teodora Gagauz regarding tasks related to trial prep - creating FedEx label and Zoom meetings.
9/17/2021	Jean Ger	Paralegal	0.1	Create Zoom meeting for Larry Organ and Michael Wheeler; add to calendar.
9/17/2021	Jean Ger	Communication	0.1	Text message to Larry Organ regarding coordinating emailing witnesses Zoom meeting links.

Date	User	Activity	Time	Description
9/17/2021	Jean Ger	Paralegal	0.1	Create Tom Kawasaki Zoom meeting for witness preparation; add to calendar.
9/17/2021	Jean Ger	Communication	0.1	Email Tamotsu Kawasaki the Zoom meeting information for trial preparation with Larry Organ.
9/17/2021	Jean Ger	Communication	0.1	Email to witness Michael Wheeler with Zoom meeting dial-in information for witness prep.
9/22/2021	Jean Ger	Meet	1.6	Meet with Bernard Alexander, Larry Organ, Susan Organ, Navruz Avloni, Sabrina Grislis, Cimone Nunley, Julianne Stanford, and Emily Kohlheim via ZOOM for opening statement practice.
9/25/2021	Jean Ger	Meet	1.3	Meet via ZOOM with trial team and other participants for second run through of opening statement. Left after providing my feedback.
9/29/2021	Jean Ger	Communication	7.5	Drive to (2.0)/from trial (1.0); Attend Trial (4.5)
9/30/2021	Jean Ger	Communication	0.1	Call with Susan Organ regarding defense strategy and plaintiff testimony.
9/30/2021	Jean Ger	Communication	0.2	Draft and send text message regarding issue flagged for redirect.
9/30/2021	Jean Ger	Communication	0.2	Draft and send email per Susan Organ's request to Larry Organ about team observation from defense's examination of Owen Diaz.
10/4/2021	Jean Ger	Appearance/ Attend	6.8	Attend closing argument (5.0); drive to/from CA Northern District Courthouse (1.8)
10/5/2021	Jean Ger	Paralegal	0.1	Save verdict form ( docket number 291) to file.
10/11/2021	Jean Ger	Paralegal	0.1	Update expenses.
12/22/2021	Jean Ger	Communication	0.1	Email response to Sabrina Grislis regarding binders task.
12/27/2021	Jean Ger	Communication	0.1	Call with Larry Organ regarding post-trial binders task.
12/28/2021	Jean Ger	Research	1.9	Research and compile cases cited in defendant's NOTICE OF MOTION AND MOTION FOR JUDGMENT AS A MATTER OF LAW, NEW TRIAL AND/OR REMITTITUR PURSUANT TO FEDERAL RULES OF CIVIL PROCEDURE 50 AND 59 using WestLaw.
12/28/2021	Jean Ger	Communication	0.1	Draft and send email to Larry Organ with cases cited in defendant's post trial motion.
12/28/2021	Jean Ger	Communication	0.1	Call with Larry Organ regarding TOA cases cited in defendant's post trial motion, references to the trial transcript record task, and compiling an electronic combined PDF for Michael Ruben.
12/28/2021	Jean Ger	Communication	0.1	Email response to Larry Organ regarding clarification on compiling case citations task.
12/28/2021	Jean Ger	Research	0.4	Continue aggregating case citations in post trial motions from WestLaw.
12/29/2021	Jean Ger	Research	0.7	Aggregating cases cited in post-trial motion on WestLaw.
12/29/2021	Jean Ger	Research	1.3	Finish aggregating case citations in post-trial motions in WestLaw.
12/29/2021	Jean Ger	Paralegal	0.3	Organizing cases pulled from post-trial motions.
12/30/2021	Jean Ger	Review/ Analyze	1.4	Finish organizing and removing duplicate cases/reviewing case citations in post-trial motions. Aggregate into one PDF with bookmarks alphabetically.
12/30/2021	Jean Ger	Paralegal	0.1	Save combined case citations from post-trial motions to file.



Date	User	Activity	Time	Description
12/30/2021	Jean Ger	Communication	0.1	MSabrina Grislis request to Julianne Stanford regarding help with finding two missing case citations in post-trial briefing.
12/30/2021	Jean Ger	Communication	0.1	Text message to Larry Organ providing status update on post-trial motions task.
12/30/2021	Jean Ger	Paralegal	0.1	Locate two missing citations from post-trial motions on Westlaw.
12/30/2021	Jean Ger	Paralegal	0.1	Combine case citations in post-trial motions into single PDF with bookmarks, alphabetized; save to file.
12/30/2021	Jean Ger	Paralegal	0.1	Revise combined PDF of case citations in post-trial briefing as requested by Larry Organ and save to file.
12/30/2021	Jean Ger	Paralegal	3.7	Pulling transcript citations from trial transcripts and aggregating into single PDF for post-trial motion work.
12/30/2021	Jean Ger	Paralegal	0.1	Upload and save aggregated trial transcript citations to file.

Date	User	Activity	Time	Description
8/24/2018	Sabrina Grislis	Communication	0.3	Call Judge Orrick's clerk to clarify rules for remote appearances for Case Management Conferences.
8/24/2018	Sabrina Grislis	Plan/ Prepare	0.4	Set up Court Call appearance for upcoming Case Management Conference.
8/28/2018	Sabrina Grislis	Postage/Delivery	0.1	Print Case Management Statement and FedEx label for mailing.
8/28/2018	Sabrina Grislis	File/ Serve	0.2	FedEx drop off of Case Management Statement courtesy copy to Judge Orrick.
8/28/2018	Sabrina Grislis	File/ Serve	0.3	File Joint Case Management Statement with the help of Cimone Nunley
10/9/2018	Sabrina Grislis	Paralegal	0.5	Prepare exhibits for mediation brief
10/12/2018	Sabrina Grislis	Paralegal	0.6	Review case costs prior to mediation.
10/16/2018	Sabrina Grislis	Paralegal	0.2	Client call regarding mediation.
10/16/2018	Sabrina Grislis	Paralegal	0.1	Save costs costs.
11/9/2018	Sabrina Grislis	Meet	0.1	Meet with Larry Organ regarding service of discovery
11/9/2018	Sabrina Grislis	File/ Serve	0.3	Serve Plaintiffs' notices of videotaped depositions of Defendants West Valley's and Citistaff's persons most knowledgeable and request for production of documents via personal delivery.
11/9/2018	Sabrina Grislis	Communication	0.2	Contact Godspeed courier to schedule personal delivery of the deposition notices of Defendants' West Valley and Citistaff persons most knowledgeable
11/12/2018	Sabrina Grislis	Paralegal	1	Review and update costs and expenses in case.
11/15/2018	Sabrina Grislis	Draft/ Revise	1.5	Draft and serve the deposition notices of Edward Romero and Monica Deleon.
11/15/2018	Sabrina Grislis	Communication	0.2	Email to investigator Stu Kohler regarding locating Rothaj Foster and Wayne Jackson
11/16/2018	Sabrina Grislis	File/ Serve	0.4	Serve the deposition notices of Ramon Martinez, Wayne Jackson, and Rothaj Foster
11/16/2018	Sabrina Grislis	Draft/ Revise	0.8	Draft the deposition notices and subpoenas for Ramon Martinez, Rothaj Foster, and Wayne Jackson
11/20/2018	Sabrina Grislis	File/ Serve	0.3	Serve the deposition notices for Defendants Tesla's and Citistaff's persons most knowledgeable by US mail and electronic mail.
11/26/2018	Sabrina Grislis	Paralegal	0.8	Investigate witness Ramon Martinez for subpoena
11/28/2018	Sabrina Grislis	Paralegal	2	Prepare exhibits for Edward Romero deposition.
11/29/2018	Sabrina Grislis	Communication	0.2	Telephone call with Larry Organ regarding preparing exhibits for deposition

Date	User	Activity	Time	Description
12/5/2018	Sabrina Grislis	Paralegal	2.1	Prepare the exhibit binders for the deposition of Monica Deleon
12/10/2018	Sabrina Grislis	Meet	0.1	Meet with Larry Organ to discuss preparation of exhibits for tomorrow's deposition of West Valley PMK
12/14/2018	Sabrina Grislis	File/ Serve	0.4	File stipulation to continue trial and amend complaint and the amended complaint on ECF with the assistance of Noah Baron
12/20/2018	Sabrina Grislis	Communication	0.3	Discuss courtesy copy requirements with Cimone Nunley
12/26/2018	Sabrina Grislis	Communication	0.1	Discuss filing amended complaint with Cimone Nunley, review instructions
12/26/2018	Sabrina Grislis	File/ Serve	0.3	File amended complaint for damages via ECF
1/3/2019	Sabrina Grislis	Paralegal	0.5	Calendar new deadlines per the trial continuance stipulation
1/22/2019	Sabrina Grislis	Paralegal	0.1	team meeting
2/12/2019	Sabrina Grislis	File/ Serve	0.4	Serve Plaintiff Owen Diaz's interrogatories, set two; request for production of documents, set four to Defendant Tesla
3/11/2019	Sabrina Grislis	Paralegal	0.3	Prepare amended discovery responses for Plaintiff.
3/11/2019	Sabrina Grislis	File/ Serve	0.3	Serve Plaintiffs' Supplemental Initial Disclosures
3/26/2019	Sabrina Grislis	File/ Serve	0.3	Serve Plaintiffs' site inspection demand
3/27/2019	Sabrina Grislis	Meet	0.1	team meeting
4/2/2019	Sabrina Grislis	File/ Serve	0.3	Serve Plaintiff's Third Amended Notice of Deposition of Citistaff's PMK
4/26/2019	Sabrina Grislis	File/ Serve	0.3	Serve the deposition notice of nextSource's PMK; fourth amended Wayne Jackson deposition notice and subpoena
5/29/2019	Sabrina Grislis	Paralegal	2.2	Prepare the deposition exhibits for the deposition of Tesla's PMK
6/6/2019	Sabrina Grislis	Communication	0.2	Discuss responses to Tesla's discovery with Cimone Nunley
6/10/2019	Sabrina Grislis	Draft/ Revise	1	Draft discovery response shells
7/9/2019	Sabrina Grislis	Paralegal	0.5	organize subpoenas
7/10/2019	Sabrina Grislis	Paralegal	0.3	Follow up with witness regarding errata sheet
7/24/2019	Sabrina Grislis	Paralegal	0.2	call Patterson to confirm depo
7/25/2019	Sabrina Grislis	Communication	0.1	Discuss summarizing depositions with Cimone Nunley
8/7/2019	Sabrina Grislis	Paralegal	0.1	pay depo invoice for client depositions - esquire

Date	User	Activity	Time	Description
8/13/2019	Sabrina Grislis	Paralegal	0.2	calling about Lamar depo invoice - Chase
8/16/2019	Sabrina Grislis	File/ Serve	0.5	Serve Plaintiff's supplemental discovery requests
8/28/2019	Sabrina Grislis	Paralegal	0.4	organize correspondence folder
8/28/2019	Sabrina Grislis	Paralegal	0.2	file association of counsel for Bernard Alexander
9/10/2019	Sabrina Grislis	Paralegal	2	prep docs for CMC
9/11/2019	Sabrina Grislis	Paralegal	3	prep discovery reqs for service serve to SF offices
9/11/2019	Sabrina Grislis	Meet	0.1	Meet with Larry Organ regarding discovery
9/11/2019	Sabrina Grislis	Communication	0.1	Telephone call with Larry Organ regarding discovery deadlines
9/16/2019	Sabrina Grislis	Paralegal	0.1	Meet with team to discuss case status, trial planning and discovery
9/18/2019	Sabrina Grislis	Paralegal	0.1	TC w client re settlement conference date
9/18/2019	Sabrina Grislis	Paralegal	0.7	TC with clients re MSC - email to clerk with dates
9/19/2019	Sabrina Grislis	Paralegal	0.4	prep shells for MSJ opp
10/1/2019	Sabrina Grislis	Meet	0.1	Team Meeting
10/2/2019	Sabrina Grislis	Paralegal	7	support/prep MSJ opp and admin motion for filing; serve
10/3/2019	Sabrina Grislis	Communication	0.1	Call to Jean Ger about FedEx information I need to send case documents
10/4/2019	Sabrina Grislis	Communication	0.1	Communication with Larry Organ regarding materials to provide to expert
10/7/2019	Sabrina Grislis	Paralegal	0.5	organize depo schedule, FU re witnesses
10/7/2019	Sabrina Grislis	Paralegal	0.3	calendaring check
10/7/2019	Sabrina Grislis	Research	0.6	Research witness information for scheduling depositions
10/8/2019	Sabrina Grislis	Communication	0.1	Communication with Larry Organ regarding this week's deposition schedule
10/8/2019	Sabrina Grislis	Communication	0.2	Discuss witness status with Cimone Nunley
10/9/2019	Sabrina Grislis	Communication	0.1	Communication with Larry Organ regarding Josue Torres deposition
10/10/2019	Sabrina Grislis	Communication	0.1	Discuss task related to Tesla's financial statements with Cimone Nunley

Date	User	Activity	Time	Description
10/11/2019	Sabrina Grislis	Paralegal	1	saving invoices and POSS
10/14/2019	Sabrina Grislis	Review/ Analyze	2.6	Review Tesla's public financial statements
10/14/2019	Sabrina Grislis	Review/ Analyze	1.3	Prepare deposition summary of West Valley staffing's PMK Teresa Kossayan
10/15/2019	Sabrina Grislis	Paralegal	0.6	depo summary
10/16/2019	Sabrina Grislis	Paralegal	0.5	review/save depo videos
10/16/2019	Sabrina Grislis	Paralegal	1.2	depo summary
10/17/2019	Sabrina Grislis	Paralegal	0.7	depo summary
10/21/2019	Sabrina Grislis	Paralegal	0.2	courtesy copies to judge
10/22/2019	Sabrina Grislis	Plan/ Prepare	0.8	Assist preparing for the motion for summary judgement hearing; prepare notes for argument
10/24/2019	Sabrina Grislis	Paralegal	0.7	find court reporter last minute for the deposition of Andres Donet
10/24/2019	Sabrina Grislis	File/ Serve	0.4	File transcript request form for Motion for Summary Judgement hearing; phone call with Richard Duvall regarding my typo of 2020 instead of 2019 on request form, clarification on my request.
10/24/2019	Sabrina Grislis	Paralegal	0.4	Prepare exhibits, trial subpoena, disclosure form for deposition of Andres Donet
10/30/2019	Sabrina Grislis	Paralegal	0.3	Save and label Tesla and nextSource Motions for Summary judgement to file
10/30/2019	Sabrina Grislis	Paralegal	0.3	save and organize deposition exhibits
11/5/2019	Sabrina Grislis	Paralegal	0.7	Follow up with experts regarding their depositions and scheduling
11/5/2019	Sabrina Grislis	Review/ Analyze	0.3	Prepare deposition summary of Veronica Martinez
11/19/2019	Sabrina Grislis	Paralegal	0.2	save Tesla's motion to retain confidentiality
11/19/2019	Sabrina Grislis	Paralegal	2	MSJ opp exhibits
11/19/2019	Sabrina Grislis	Draft/ Revise	1	Finalize the briefing for the opposition to the Motion for Summary Judgement: create table of contents and table of authorities, check for correct dates and signatures, convert to PDF
11/19/2019	Sabrina Grislis	Draft/ Revise	1	Finalize the exhibits to the opposition to Tesla's MSJ and related administrative motion to file under seal
11/19/2019	Sabrina Grislis	File/ Serve	0.7	File and serve the oppositions and related administrative motions to the Motions for Summary Judgement

Date	User	Activity	Time	Description
11/20/2019	Sabrina Grislis	Paralegal	2.4	prepare and send courtesy copies of Plaintiff's Opposition to Tesla's Motion for Summary Judgement
11/20/2019	Sabrina Grislis	Communication	0.2	Telephone call with Cimone Nunley to receive instructions related to courtesy copies of administrative motion
12/23/2019	Sabrina Grislis	Communication	0.1	Discussion with Cimone Nunley about informing witness Michael Wheeler of new trial date
12/30/2019	Sabrina Grislis	Communication	0.3	Discussion with Cimone Nunley regarding the procedure for challenging confidentiality designations
1/2/2020	Sabrina Grislis	Paralegal	0.7	research local rules re settlement conference statement
1/2/2020	Sabrina Grislis	Paralegal	1.6	review Tesla doc prod for confidentiality challenge
1/2/2020	Sabrina Grislis	Paralegal	0.5	send/prep courtesy copy of settlement conference statement
1/3/2020	Sabrina Grislis	Paralegal	0.4	Prep to send payment of MSJ transcript court reporter fee
1/3/2020	Sabrina Grislis	Paralegal	0.5	resending/serving settlement conference statement with correct demand amount
1/3/2020	Sabrina Grislis	Paralegal	3.8	doc review for confidentiality challenge
1/7/2020	Sabrina Grislis	Communication	0.1	Discussion with Cimone Nunley about preparing binder for mandatory settlement conference
1/13/2020	Sabrina Grislis	File/ Serve	0.3	File administrative motion to file documents under seal for motion for sanctions with the assistance of Cimone Nunley
1/14/2020	Sabrina Grislis	Communication	0.1	Discuss courtesy copies of motion for sanctions with Cimone Nunley before sending; request she reviews documents before i send
1/14/2020	Sabrina Grislis	Paralegal	0.7	Prepare and send chambers copies of administrative motion to file documents under seal and of motion for sanctions
2/3/2020	Sabrina Grislis	Paralegal	0.3	dec for motion for sanctions reply
2/3/2020	Sabrina Grislis	Paralegal	2.1	prep and file reply and admin motion for sanctions motion
2/3/2020	Sabrina Grislis	Paralegal	0.3	prep depo cites for reply
2/19/2020	Sabrina Grislis	Communication	0.5	Meet with Cimone Nunley to review items on pretrial checklist
3/2/2020	Sabrina Grislis	Communication	0.1	Telephone call with Cimone Nunley regarding production of Amy Oppenheimer documents
3/3/2020	Sabrina Grislis	Paralegal	0.2	prep courtesy copy of trial continuance stip with Teo
3/3/2020	Sabrina Grislis	Paralegal	1.1	Amy Oppenheimer doc prod - redacting and serving
3/10/2020	Sabrina Grislis	File/ Serve	0.1	File notice of appearance of Cimone Nunley via ECF

Date	User	Activity	Time	Description
3/10/2020	Sabrina Grislis	Meet	1.2	Meet with Cimone Nunley, Larry Organ, and Susan Organ to discuss case status and upcoming to do items
3/13/2020	Sabrina Grislis	File/ Serve	0.2	File unredacted motion for summary judgement oppositions and exhibits pursuant to court's order
3/13/2020	Sabrina Grislis	Draft/ Revise	0.6	Prepare redactions to motion for summary judgement oppositions and exhibits for refiling pursuant to the court's order
3/22/2020	Sabrina Grislis	Communication	0.1	Phone call with Cimone Nunley regarding trial exhibits
3/23/2020	Sabrina Grislis	Communication	0.1	Phone call with Cimone Nunley regarding format of trial exhibits
3/23/2020	Sabrina Grislis	Paralegal	0.4	Compress trial exhibits, address tech issues with assistance of Jean Ger
3/24/2020	Sabrina Grislis	Communication	0.1	Call with Larry Organ regarding trial witness information
3/27/2020	Sabrina Grislis	Communication	0.1	Discussion with Cimone Nunley regarding me too task to complete
4/2/2020	Sabrina Grislis	Communication	0.1	Email exchange with Navruz Avloni regarding witness information
4/2/2020	Sabrina Grislis	Paralegal	0.3	Calendar new trial related deadlines
4/2/2020	Sabrina Grislis	Communication	0.1	Discussion with Larry Organ regarding witness information
4/3/2020	Sabrina Grislis	Communication	0.1	Email exchange with Larry Organ regarding task relating to objections to deposition designations of Owen Diaz
4/3/2020	Sabrina Grislis	Draft/ Revise	0.4	Prepare table including Defendant Tesla's designations of Owen Diaz's deposition testimony and Plaintiff's objections
4/3/2020	Sabrina Grislis	Communication	0.1	Phone call with Larry Organ regarding trial exhibits
4/3/2020	Sabrina Grislis	Communication	0.2	Phone call with Larry Organ, Cimone Nunley, and Navruz Avloni regarding witness information for trial subpoenas
4/6/2020	Sabrina Grislis	Communication	0.1	Phone call with Larry Organ, Navruz Avloni, and Cimone Nunley regarding status of case
4/7/2020	Sabrina Grislis	Communication	0.1	Call with Cimone Nunley to discuss the witness declaration status
4/8/2020	Sabrina Grislis	Communication	0.1	Phone call with Larry Organ, Navruz Avloni, and Cimone Nunley regarding upcoming tasks
4/10/2020	Sabrina Grislis	Communication	0.1	Phone call with Larry Organ regarding exhibits
4/17/2020	Sabrina Grislis	Meet	2.1	Meet with jury consultant Harry Plotkin, along with Larry Organ, Bernard Alexander, Navruz Avloni, Cimone Nunley, and Susan Organ to discuss trial, themes
4/22/2020	Sabrina Grislis	Communication	0.1	Phone call with Larry Organ regarding OCRing trial exhibits
4/22/2020	Sabrina Grislis	Plan/ Prepare	0.4	OCR trial exhibits, save to iPads and Dropbox

Date	User	Activity	Time	Description
4/27/2020	Sabrina Grislis	Communication	0.1	Phone call with Larry Organ regarding filing of pretrial conference documents
4/27/2020	Sabrina Grislis	Communication	0.1	Additional phone call with Larry Organ regarding filing of pretrial conference documents
4/27/2020	Sabrina Grislis	Communication	0.1	Follow up phone call with Larry Organ regarding filing of pretrial conference documents
5/6/2020	Sabrina Grislis	Communication	0.3	Phone call with Cimone Nunley regarding pretrial tasks and deadlines
6/17/2020	Sabrina Grislis	Meet	1.6	Meet with Harry Plotkin, Larry Organ, Bernard Alexander, Cimone Nunley, and Susan Organ regarding case themes and strategy
7/10/2020	Sabrina Grislis	Paralegal	0.2	(STATE COURT) - save order from domain web, update calendar with new CMC date
7/29/2020	Sabrina Grislis	Meet	0.7	Meet with Mika Hilaire, Bernard Alexander, Larry Organ, Cimone Nunley, Susan Organ re focus group
7/29/2020	Sabrina Grislis	Meet	0.7	Meet with Larry Organ, Bernard Alexander, Cimone Nunley, Susan Organ, and Mika Hilaire regarding the focus group
8/6/2020	Sabrina Grislis	Meet	1.3	Meet with team, Harry and Mika to discuss focus group
8/13/2020	Sabrina Grislis	Communication	0.1	Call with Cimone Nunley regarding deposition videos needed for focus group presentation
8/14/2020	Sabrina Grislis	Meet	0.5	Meet with Larry Organ, Cimone Nunley, and Susan Organ regarding focus group
8/15/2020	Sabrina Grislis	Appearance/ Attend	4	Attend Zoom focus group, take notes and observe
8/15/2020	Sabrina Grislis	Meet	0.9	Post focus group meeting and debrief with Harry Plotkin, Dustin Collier, and trial team
8/17/2020	Sabrina Grislis	Meet	0.2	team meeting
8/19/2020	Sabrina Grislis	Meet	1.6	Meet with Harry Plotkin and trial team to discuss themes and strategy post focus group
9/23/2020	Sabrina Grislis	Meet	0.1	Phone meeting with Larry Organ, Cimone Nunley, and Navruz Avloni regarding the settlement conference
10/23/2020	Sabrina Grislis	Meet	0.9	Meet with trial team to discuss themes, trial issues, etc.
11/12/2020	Sabrina Grislis	Communication	0.1	Telephone call with Larry Organ regarding trial
11/13/2020	Sabrina Grislis	Communication	0.3	Telephone call with Cimone Nunley regarding calendaring deadlines
2/12/2021	Sabrina Grislis	Paralegal	0.2	Create Zoom meeting for 2/16 meeting with OC to discuss trial date, send to OC and share calendar event.
3/3/2021	Sabrina Grislis	Paralegal	0.3	Update calendar with new trial date
6/22/2021	Sabrina Grislis	Meet	0.8	Trial prep meeting with Cimone Nunley, Larry Organ, and Bernard Alexander



Date	User	Activity	Time	Description
6/28/2021	Sabrina Grislis	Paralegal	0.6	Mark Owen Diaz's miniscript deposition testimony with Defense counsel's designations for attorneys and client to review
6/28/2021	Sabrina Grislis	Communication	0.1	Email to Larry, Nav, and Cimone that Owen's highlighted testimony is completed; confirming that I will send to client and set up Zoom
6/28/2021	Sabrina Grislis	Communication	0.1	Email to client Owen Diaz with Zoom meeting information for prep with Larry; attached deposition testimony highlighted with Tesla's designations for client to review
6/28/2021	Sabrina Grislis	Paralegal	0.1	Set up Zoom meeting for Owen and Larry on July 17 to prepare for trial, review testimony designated by Tesla
7/1/2021	Sabrina Grislis	Review/ Analyze	0.3	Review and highlight the deposition testimony designated by Defendant for use at trial for Demetric Di-az's deposition
7/1/2021	Sabrina Grislis	Communication	0.1	Email to Larry Organ, Navruz Avloni, and Cimone Nunley regarding the highlighted deposition testimony for Defendant's designations of Demetric Di-az's deposition testimony
7/19/2021	Sabrina Grislis	Paralegal	0.7	Print and prepare documents for client to pick up for trial prep
7/19/2021	Sabrina Grislis	Meet	1.5	Meet with Owen Diaz to discuss case (left early)
7/19/2021	Sabrina Grislis	Paralegal	0.1	Upload deposition videos to shared folder for client
7/19/2021	Sabrina Grislis	Communication	0.1	Email to client informing him that videos are being uploaded
7/21/2021	Sabrina Grislis	Communication	0.1	Call with Cimone Nunley about witnesses for trial
7/27/2021	Sabrina Grislis	Research	2.4	Organize witness information and research witness location
8/16/2021	Sabrina Grislis	Meet	4.2	Meet with team to prepare for trial (witnesses, schedules, focus groups)
8/17/2021	Sabrina Grislis	Paralegal	0.3	Check that we have the original transcripts for depositions noticed by us
8/18/2021	Sabrina Grislis	Draft/ Revise	1.2	Draft survey monkey for focus group
8/18/2021	Sabrina Grislis	Draft/ Revise	0.2	Draft Craigslist ad for 9/5 focus group
8/18/2021	Sabrina Grislis	Meet	0.9	Meet with Larry, Bernard, Cimone, and Harry (partial) to discuss upcoming trial and focus group [late arrival]
8/18/2021	Sabrina Grislis	Communication	0.2	Call with Cimone Nunley to discuss witnesses for trial
8/25/2021	Sabrina Grislis	Paralegal	0.3	Reorganize witness folders in trial folder on Dropbox
8/25/2021	Sabrina Grislis	Paralegal	0.3	Post focus group ad, double check everything is included and correct
8/26/2021	Sabrina Grislis	Communication	0.2	Call and follow up email to client Owen Diaz regarding prep for trial

Date	User	Activity	Time	Description
8/26/2021	Sabrina Grislis	Paralegal	0.1	Order day 3 deposition video from Owen Diaz
8/27/2021	Sabrina Grislis	Communication	0.2	Call with Lamar Patterson regarding trial
8/31/2021	Sabrina Grislis	Review/ Analyze	1	Review potential focus group participants' responses to Survey
9/1/2021	Sabrina Grislis	Communication	0.2	Call with Cimone Nunley to discuss focus group participant selection
9/1/2021	Sabrina Grislis	Review/ Analyze	0.9	Review survey responses to select focus group participants
9/1/2021	Sabrina Grislis	Paralegal	0.2	Create Zoom meetings for the two focus group panels on 9/5
9/1/2021	Sabrina Grislis	Communication	1.9	Call focus group panelists to confirm availability
9/3/2021	Sabrina Grislis	Meet	0.1	Meet with Cimone Nunley and Larry Organ to discuss focus group
9/3/2021	Sabrina Grislis	Draft/ Revise	0.2	Draft post-focus group survey on Survey Monkey
9/3/2021	Sabrina Grislis	Communication	0.2	Call with Cimone Nunley about changes to post-focus group survey
9/3/2021	Sabrina Grislis	Communication	0.1	Email to team about this Sunday's focus groups
9/3/2021	Sabrina Grislis	Draft/ Revise	0.2	Revise post-focus group survey
9/5/2021	Sabrina Grislis	Appearance/ Attend	4.1	Attend focus groups
9/5/2021	Sabrina Grislis	Plan/ Prepare	0.6	Prepare for focus groups
9/5/2021	Sabrina Grislis	Paralegal	0.5	Send payment to focus group participants
9/5/2021	Sabrina Grislis	Meet	0.4	Meet with Larry Organ, Cimone Nunley, Navruz Avloni, and Susan Organ after the focus group panels to debrief
9/8/2021	Sabrina Grislis	Paralegal	0.5	Review pretrial order for dates regarding exhibits and demonstratives
9/8/2021	Sabrina Grislis	Paralegal	0.2	Upload exhibits to Trial Pad for use at trial
9/9/2021	Sabrina Grislis	Research	1.9	Research witnesses for trial on PeopleMap to find their best addresses for service of trial subpoena
9/10/2021	Sabrina Grislis	Plan/ Prepare	2.1	Prepare and send trial subpoenas for witnesses
9/10/2021	Sabrina Grislis	Meet	1.3	Meet with Larry, Bernard, Cimone, Navruz, and Susan about trial prep
9/10/2021	Sabrina Grislis	Communication	0.3	Text witnesses Lamar Patterson, Nigel Jones, Michael Wheeler, and Titus McCaleb about their trial subpoenas
9/11/2021	Sabrina Grislis	Paralegal	2.5	Upload exhibits to TrialPad for use at trial

Date	User	Activity	Time	Description
9/11/2021	Sabrina Grislis	Paralegal	2	Review supplies and place order for items needed at trial
9/11/2021	Sabrina Grislis	Paralegal	0.5	Prepare trial box and review contents to see what else needs to be ordered
9/12/2021	Sabrina Grislis	Paralegal	1.5	Finish uploading exhibits to TrialPad for use at trial
9/12/2021	Sabrina Grislis	Communication	0.1	Email to team to request their vaccination information for trial
9/12/2021	Sabrina Grislis	Paralegal	0.2	Save team's vaccination information to provide to court
9/12/2021	Sabrina Grislis	Communication	0.1	Email to team to get list of deposition videos we need synced with transcripts for use at trial
9/12/2021	Sabrina Grislis	Review/ Analyze	1.1	Review defendant's exhibits and compare them to the previously sent exhibits to look for any discrepancies
9/12/2021	Sabrina Grislis	Review/ Analyze	0.2	Review list of deposition videos to ensure which ones were recorded and are in our possession
9/12/2021	Sabrina Grislis	Communication	0.1	Text to Nigel Jones regarding preparing for trial testimony and itinerary for planning
9/12/2021	Sabrina Grislis	Communication	0.1	Email Bridget Mattos and Associates about getting deposition videos and transcripts synced for use at trial
9/13/2021	Sabrina Grislis	File/ Serve	0.1	Serve trial subpoenas on Tesla
9/13/2021	Sabrina Grislis	Draft/ Revise	0.2	Prepare Proof of Service of trial subpoenas
9/13/2021	Sabrina Grislis	Review/ Analyze	0.3	Review trial subpoenas for witnesses to ensure accuracy before serving
9/14/2021	Sabrina Grislis	Draft/ Revise	0.1	Prepare Certified of Service for serving Wayne Jackson trial subpoena
9/14/2021	Sabrina Grislis	File/ Serve	0.1	Serve Wayne Jackson trial subpoena on nextSource counsel per agreement
9/14/2021	Sabrina Grislis	Communication	0.2	Texting with lamar to set up service of trial subpoena and coordinate prep
9/14/2021	Sabrina Grislis	Communication	0.1	Email to Larry, Cimone, Navruz, and Bernard about who can do prep with Lamar and La'Drea
9/14/2021	Sabrina Grislis	Communication	0.1	Texting with La'Drea Jones about setting up prep for trial
9/14/2021	Sabrina Grislis	Communication	0.1	Send trial subpoena to process server Rob Goodstein for service on lamar patterson
9/14/2021	Sabrina Grislis	Communication	0.1	Email to Titus McCaleb about setting up prep for trial
9/14/2021	Sabrina Grislis	Communication	0.1	Call to San Anselmo Inn about a room for Cimone for trial
9/14/2021	Sabrina Grislis	Communication	0.1	Email to Kathy at Bridget Mattos and Associates (court reporter) about shared deposition videos for syncing project
9/14/2021	Sabrina Grislis	Paralegal	0.1	Share file with deposition videos with Kathy for syncing

Date	User	Activity	Time	Description
9/14/2021	Sabrina Grislis	Communication	0.2	Emailing with Kathy at Bridget Mattos and Associates about getting deposition videos synced with transcripts for use at trial
9/15/2021	Sabrina Grislis	Communication	0.1	Email exchange with Kathy and Bridget Mattos and Associates regarding synced deposition videos
9/15/2021	Sabrina Grislis	Paralegal	8	Prepare binders for use at trial of Plaintiff's exhibits, Defendant's exhibits, deposition testimony
9/15/2021	Sabrina Grislis	Communication	0.2	Email exchange with team regarding our request for daily trial transcripts
9/15/2021	Sabrina Grislis	File/ Serve	0.2	File Plaintiffs' request for daily trial transcripts
9/15/2021	Sabrina Grislis	Communication	0.2	Call with Michael Wheeler regarding his trial appearance and testimony
9/15/2021	Sabrina Grislis	Communication	0.1	Email to team regarding Michael Wheeler's prep for trial testimony
9/15/2021	Sabrina Grislis	Communication	0.3	Email to Michael Wheeler with the Zoom information for his prep, deposition transcript, and notice of acknowledgement to sign
9/15/2021	Sabrina Grislis	Communication	0.1	Email to ipro rep Katarina regarding issue with downloading software for deposition clips
9/15/2021	Sabrina Grislis	Communication	0.5	Discussion with Larry Organ regarding exhibits and trial preparation
9/16/2021	Sabrina Grislis	Paralegal	3	Prepare binders for use at trial
9/16/2021	Sabrina Grislis	Review/ Analyze	0.2	Prepare chart with status of service of witnesses
9/16/2021	Sabrina Grislis	Communication	0.2	Email to team with the witness service status chart; request information on who else needs to be served
9/16/2021	Sabrina Grislis	Communication	0.5	Call Comcast to make request for phone records of Ramon Martinez call
9/16/2021	Sabrina Grislis	Draft/ Revise	0.4	Draft the written request to comcast for phone records of Ramon Martinez call
9/16/2021	Sabrina Grislis	Communication	0.4	Send written request to Comcast of phone records from Ramon Martinez call - several attempts made because of fax failure
9/19/2021	Sabrina Grislis	Communication	0.1	Discussion with Larry Organ regarding Kevin McGinn's testimony
9/20/2021	Sabrina Grislis	Draft/ Revise	0.4	Revise Plaintiff's deposition designations of Kevin McGinn's deposition testimony
9/20/2021	Sabrina Grislis	Communication	0.1	Email to Kathy at Bridget Mattos and Associates regarding additional deposition video needing syncing, request update for remainder of videos
9/20/2021	Sabrina Grislis	Paralegal	0.1	Set up Zoom meeting for prep with La'Drea Jones on Wednesday at 4 pm
9/20/2021	Sabrina Grislis	Communication	0.1	Email Zoom meeting information to La'Drea Jones
9/20/2021	Sabrina Grislis	Communication	0.1	Call to Wayne Jackson, left voicemail, about trial subpoena and signing notice of acknowledgement

Date	User	Activity	Time	Description
9/20/2021	Sabrina Grislis	Communication	0.1	Send reminder via AdobeSign to Wayne Jackson regarding the subpoena and notice of acknowledgement
9/20/2021	Sabrina Grislis	Communication	0.1	Email to Gus Ham about the deposition video of Erin Marconi issues
9/20/2021	Sabrina Grislis	Draft/ Revise	0.1	Update chart of service status of trial subpoenas
9/20/2021	Sabrina Grislis	Communication	0.1	Email to team with status update of witness service chart
9/20/2021	Sabrina Grislis	Draft/ Revise	0.2	Finalize the joint pretrial conference statement, exhibit list, and witness list for filing
9/20/2021	Sabrina Grislis	File/ Serve	0.2	File the joint pretrial conference statement, exhibit list, and witness list
9/20/2021	Sabrina Grislis	Draft/ Revise	0.1	Add in Defendant's counter designations of Kevin McGinn's testimony
9/20/2021	Sabrina Grislis	Paralegal	0.1	Save the file stamped joint witness list, exhibit list, and pretrial conference statement
9/20/2021	Sabrina Grislis	Communication	0.1	Send Larry Organ the revised version of Kevin McGinn's designations including Defendant's counterdesignations
9/20/2021	Sabrina Grislis	Draft/ Revise	0.2	Finalize the revised deposition designations of Kevin mcGinn
9/20/2021	Sabrina Grislis	File/ Serve	0.2	File the revised deposition designations of Kevin mcGinn
9/21/2021	Sabrina Grislis	Paralegal	5.3	Put together binders for trial
9/21/2021	Sabrina Grislis	Draft/ Revise	0.4	Draft cover letter for subpoena to Monica Deleon
9/21/2021	Sabrina Grislis	Paralegal	0.6	Search for originals of discovery responses in physical files of discovery responses which are exhibits in the trial
9/21/2021	Sabrina Grislis	Paralegal	0.6	Upload synced transcripts and video files of Veronica Martinez, Annalisa Heisen, and Ed Romero to TrialDirector
9/21/2021	Sabrina Grislis	Paralegal	0.5	Prepare and send FedEx package to Tom Kawasaki of anticipated exhibits for his trial testimony
9/21/2021	Sabrina Grislis	Communication	0.1	Email to Navruz Avloni, Cimone Nunley, Bernard Alexander, and Larry Organ asking who is available to talk with Titus McCaleb
9/22/2021	Sabrina Grislis	Paralegal	0.1	Order deposition video of Demetric Di-az for use in trial
9/22/2021	Sabrina Grislis	Communication	0.1	Email to Larry Organ and team confirming I ordered the deposition video of Demetric Di-az
9/22/2021	Sabrina Grislis	Communication	0.1	Email to Larry Organ and team about Nigel Jones testimony and appearance at trial
9/22/2021	Sabrina Grislis	Paralegal	0.1	Save Amy Oppenheimer's handwritten notes from her deposition into her trial folder
9/22/2021	Sabrina Grislis	Communication	0.1	Email to Titus McCaleb asking what time he is available to talk with an attorney today
9/22/2021	Sabrina Grislis	Draft/ Revise	1.1	Prepare chart for filing with Defendant's designation of Demetric Di-az's and Plaintiffs objections

Date	User	Activity	Time	Description
9/22/2021	Sabrina Grislis	Meet	1.6	Meet with team for BernarTesla's first run of opening practice
9/22/2021	Sabrina Grislis	Communication	0.1	Call with Cimone Nunley to discuss outstanding trial tasks
9/22/2021	Sabrina Grislis	Draft/ Revise	2	Draft the chart for filing with Defendant's designations of Demetric Di-az's deposition testimony and Plaintiff's objections
9/22/2021	Sabrina Grislis	Communication	0.5	Email exchanges with Chase Court Reporting company about obtaining the video files of Demetric Di-az's deposition testimony
9/22/2021	Sabrina Grislis	Communication	0.1	Send Defendant's counsel our proposed demonstratives for opening statements
9/22/2021	Sabrina Grislis	Communication	0.1	Send Defendant's counsel our proposed revised designations of Demetric Di-az's deposition testimony
9/22/2021	Sabrina Grislis	Communication	0.1	Call with Titus McCaleb regarding his prep call with Bernard Alexander this afternoon
9/22/2021	Sabrina Grislis	Communication	0.1	Email to Bernard Alexander confirming his call time with McCaleb and providing his contact number
9/22/2021	Sabrina Grislis	Paralegal	1	Complete preparing the trial binders
9/22/2021	Sabrina Grislis	File/ Serve	0.2	File the chart with Defendant's designations of Demetric Di-az deposition testimony and our objections
9/22/2021	Sabrina Grislis	Draft/ Revise	0.3	Finalize the chart with Defendant's designations of Demetric Di'az deposition testimony with our objections
9/22/2021	Sabrina Grislis	Communication	0.1	Call and follow up email to Wayne Jackson inquiring about his vaccination status
9/22/2021	Sabrina Grislis	Communication	0.1	Send Jean Davis and Erin Hamilton the list of Plaintiff's and Defendant's witness/counsel list for presentation to potential jurors
9/22/2021	Sabrina Grislis	Draft/ Revise	0.2	Add the names of our witnesses, staff, and counsel who will be present at the trial to the list Defendant provided for presentation to the jury
9/23/2021	Sabrina Grislis	Travel Expense	0.6	Travel to the Northern District courthouse
9/23/2021	Sabrina Grislis	Other	0.9	Drop off supplies and test technology at the Northern District Courthouse
9/23/2021	Sabrina Grislis	Other	0.8	Return from the Northern District courthouse
9/24/2021	Sabrina Grislis	Appearance/ Attend	8	Appear for trial: jury selection. Travel to and from the courthouse.
9/24/2021	Sabrina Grislis	Communication	0.1	Call to Wayne Jackson, left voicemail, letting him know of mask requirement during testimony
9/24/2021	Sabrina Grislis	Communication	0.1	Follow up with Bridget Matos' office regarding the synced videos for the deposition testimony
9/24/2021	Sabrina Grislis	Meet	0.4	Meet with Larry Organ and Susan Organ regarding demonstratives

Date	User	Activity	Time	Description
9/25/2021	Sabrina Grislis	Meet	2	Meet with Bernard Alexander, CCRLG team, and others to practice opening statement and provide feedback
9/27/2021	Sabrina Grislis	Appearance/ Attend	8	Appear at trial, day 1. Travel to and from the courthouse.
9/27/2021	Sabrina Grislis	Communication	0.6	Phone conference with Larry Organ, Navruz Avloni, Bernard Alexander, and Cimone Nunley to debrief, discuss strategy, and tasks
9/27/2021	Sabrina Grislis	Meet	0.6	Meet with Larry Organ, Bernard Alexander, Susan Organ, and Cimone Nunley regarding additional tasks
9/28/2021	Sabrina Grislis	Appearance/ Attend	8	Appear at trial, day 2. Travel to and from the courthouse
9/29/2021	Sabrina Grislis	Appearance/ Attend	8	Appear at trial, day 3. Travel to and from the courthouse.
9/29/2021	Sabrina Grislis	Meet	0.8	Meet with team over lunch to discuss witnesses
9/30/2021	Sabrina Grislis	Appearance/ Attend	8.5	Appear at trial, day 4. Travel to and from the courthouse.
9/30/2021	Sabrina Grislis	Meet	2.2	Meet with Larry Organ, Bernard Alexander, Cimone Nunley, Navruz Avloni, and Susan Organ to discuss remaining tasks and strategy
10/1/2021	Sabrina Grislis	Appearance/ Attend	7.5	Appear at trial, day 5. Travel to and from the courthouse.
10/1/2021	Sabrina Grislis	Communication	0.1	Call with Larry Organ regarding exhibits
10/2/2021	Sabrina Grislis	Communication	0.1	Call with Larry Organ to discuss designated deposition testimony for use in trial
10/2/2021	Sabrina Grislis	Plan/ Prepare	2.6	Prepare videos of deposition testimony of Annalisa Heisen and Erin Marconi
10/3/2021	Sabrina Grislis	Meet	2	Meet with Larry Organ, Navruz Avloni, Cimone Nunley, and Susan Organ to brainstorm ideas for rebuttal slides
10/4/2021	Sabrina Grislis	Appearance/ Attend	10	Appear at trial, day 6. Wait for jury's verdict. Travel to and from the courthouse.
10/7/2021	Sabrina Grislis	Meet	0.5	Post-trial check in meeting with Larry Organ, Bernard Alexander, and Cimone Nunley. Discussed next steps regarding billing, motions.
10/7/2021	Sabrina Grislis	Communication	0.1	Call with Larry Organ to discuss exhibit issues
10/12/2021	Sabrina Grislis	Meet	1.5	Meet with Michael Rubin, Jonathan Rosenthal, Larry Organ, Cimone Nunley, and Navruz Avloni regarding next steps of Diaz case in preparation for appeal
10/14/2021	Sabrina Grislis	Paralegal	0.1	Save the contact information for counsel working on appeal
10/14/2021	Sabrina Grislis	Paralegal	0.1	Save final admitted exhibits into separate folder
10/14/2021	Sabrina Grislis	File/ Serve	0.1	File Plaintiff's proposed judgement



Date	User	Activity	Time	Description
10/14/2021	Sabrina Grislis	Communication	0.2	Draft and send email to the clerk with a word version of Plaintiff's proposed judgement explaining that the parties could not come to an agreement
10/19/2021	Sabrina Grislis	Paralegal	0.1	Save judgement, docket number 307, to file
11/2/2021	Sabrina Grislis	Review/ Analyze	1.5	Review case costs to ensure that all recoverable costs are included in Bill of Costs to file today
11/2/2021	Sabrina Grislis	Review/ Analyze	2	Review Bill of Costs against exhibits to the bill of costs to check the math was done correctly and correct dollar amount
11/2/2021	Sabrina Grislis	File/ Serve	0.2	File and serve Plaintiff Owen Diaz's bill of costs and supporting documents
11/2/2021	Sabrina Grislis	Paralegal	0.8	Prepare binder of chambers copy of Plaintiff Owen Diaz's bill of costs
11/2/2021	Sabrina Grislis	Communication	0.1	Email word version of Bill of Costs document to required email address
11/2/2021	Sabrina Grislis	Communication	0.2	Calls and texts with Cimone Nunley regarding the bill of costs
11/3/2021	Sabrina Grislis	Other	0.2	Go to Post Office and send chambers copy of Plaintiff's Bill of Costs
11/11/2021	Sabrina Grislis	Research	0.9	Research jurors contact information on PeopleMap
11/24/2021	Sabrina Grislis	Meet	0.8	Meet with Larry Organ, Cimone Nunley, Navruz Avloni, Bernard Alexander, Jonathan Rosenthal and Michael Rubin to discuss opposition to Tesla's motion for judgement as a matter of law
12/5/2021	Sabrina Grislis	Draft/ Revise	1	Correct formatting issues on Plaintiff's opposition brief
12/7/2021	Sabrina Grislis	Draft/ Revise	0.5	Create the table of contents and table of authorities for Plaintiff's Opposition to Defendant's motion to judgement as a matter of law
12/7/2021	Sabrina Grislis	Paralegal	0.1	Review Judge Orrick's standing order regarding chamber's copies; no copies required per standing order
12/7/2021	Sabrina Grislis	File/ Serve	0.1	File Plaintiff's Opposition to Defendant's Motion for Judgement as a Matter of Law
12/7/2021	Sabrina Grislis	File/ Serve	0.1	File Plaintiff's Request for Judicial Notice
12/7/2021	Sabrina Grislis	Draft/ Revise	0.8	Prepare and combine the attachments to Plaintiff's Request for Judicial Notice; PDF document to prepare for filing
12/7/2021	Sabrina Grislis	Draft/ Revise	2.4	Draft the table of contents and table of authorities for Plaintiff's Opposition to Defendant's Motion for Judgement as a Matter of Law; correct formatting issues
12/7/2021	Sabrina Grislis	Communication	0.2	Email exchange with Jonathan Rosenthal about formatting issues on Plaintiff's Opposition brief
1/20/2022	Sabrina Grislis	Draft/ Revise	2	Draft the timeline of case events to use for reviewing time entries in preparation for our attorneys fees motion
2/1/2022	Sabrina Grislis	Review/ Analyze	3.5	Review time entries.



Date	User	Activity	Time	Description
2/3/2022	Sabrina Grislis	Review/ Analyze	2.3	Review time entries
2/9/2022	Sabrina Grislis	Research	0.2	Research the case National Abortion Federation (3:15-cv-3522-WHO) for the declaration of Foran in support of their motion for attorneys fees; send to Larry Organ.
2/9/2022	Sabrina Grislis	Review/ Analyze	1.4	Review time entries.
3/14/2022	Sabrina Grislis	Research	0.1	Download attorneys fees declaration and order in related case Stewart v. Kaiser
3/14/2022	Sabrina Grislis	Communication	0.1	Send attorneys fees declaration and order from SF County Superior Court case Stewart v. Kaiser to Larry Organ
4/19/2022	Sabrina Grislis	Communication	0.1	Set up Zoom link and circulate among Michael Rubin, Jonathan Rosenthal, Bernard Alexander
4/19/2022	Sabrina Grislis	Review/ Analyze	1	Review time entries
4/22/2022	Sabrina Grislis	File/ Serve	0.1	File the joint stipulation regarding the schedule for filing attorney's fees motion
4/22/2022	Sabrina Grislis	Draft/ Revise	0.2	Finalize the joint stipulation regarding the schedule for filing attorney's fees motion prior to filing
4/22/2022	Sabrina Grislis	Communication	0.1	Email the word version of the proposed order of joint stipulation regarding the schedule for filing attorney's fees motion to Judge Orrick's clerk
5/19/2022	Sabrina Grislis	Paralegal	0.4	Order the transcript of the post-trial hearing
9/19/2022	Sabrina Grislis	Paralegal	0.1	Prepare Zoom link for this evening's meeting; circulate with Michael Rubin, Jonathan Rosenthal, Bernard Alexander, and Larry Organ
11/10/2022	Sabrina Grislis	Paralegal	0.4	Review files on Dropbox for deposition videos
11/10/2022	Sabrina Grislis	Communication	0.2	Share Dropbox folders with Kathy at Bridget Mattos and Associates with deposition videos
11/10/2022	Sabrina Grislis	Paralegal	0.1	Prepare Zoom link for meeting on December 12
11/10/2022	Sabrina Grislis	Communication	0.1	Send Zoom link for December 12 meeting to team
11/15/2022	Sabrina Grislis	Draft/ Revise	0.2	Update the Certificate of Service to list Tesla's new counsel
11/15/2022	Sabrina Grislis	Draft/ Revise	0.2	Draft the Case Management Statement (for state court matter)
11/15/2022	Sabrina Grislis	Paralegal	0.3	Review the state court docket for history of defendants' appearances
11/15/2022	Sabrina Grislis	Draft/ Revise	0.1	Prepare the POS for the state court CMS
11/15/2022	Sabrina Grislis	File/ Serve	0.1	File and serve Plaintiffs' CMS (State Court)

Date	User	Activity	Time	Description
11/16/2022	Sabrina Grislis	Paralegal	0.1	Update the calendar with the new CMC date (state court)
12/7/2022	Sabrina Grislis	Paralegal	0.1	Save minute order from today's hearing on the scope of retrial; ask about ordering hearing transcript
12/12/2022	Sabrina Grislis	Meet	2.7	Team meeting to discuss retrial; scope of retrial
12/13/2022	Sabrina Grislis	Paralegal	0.1	Prepare and send Zoom meeting information to opposing counsel for meeting on December 21
12/13/2022	Sabrina Grislis	Draft/ Revise	0.1	Draft the transcript order form for the December 7, 2022 hearing
12/13/2022	Sabrina Grislis	File/ Serve	0.1	File the transcript order form for the December 7, 2022 hearing
1/9/2023	Sabrina Grislis	Communication	0.1	Email to Marla Knox regarding the 12/7/2022 hearing transcript
1/9/2023	Sabrina Grislis	Paralegal	0.2	Locate and send to Larry Organ Plaintiff's exhibits 136-139
1/9/2023	Sabrina Grislis	Communication	0.2	Send Larry Organ and Bernard Alexander the contact information for witnesses Jackson and Wheeler
1/9/2023	Sabrina Grislis	Communication	0.1	Email to Karen Elizondo at Dr. Reading's office about trial testimony
1/13/2023	Sabrina Grislis	Paralegal	0.2	Review Judge Chen's calendar for information on Tesla securities litigation with Alex Spiro
1/13/2023	Sabrina Grislis	Communication	0.1	Send Larry Organ the information for the Tesla Securities litigation trial on Monday
1/16/2023	Sabrina Grislis	Communication	0.1	Send the Zoom link for 1/17 CMC to team
1/17/2023	Sabrina Grislis	Appearance/ Attend	7.5	Attend the trial in Tesla Securities Litigation; observe voir dire
1/18/2023	Sabrina Grislis	Appearance/ Attend	2.5	Attend the trial in Tesla Securities Litigation; watch opening statements only
1/18/2023	Sabrina Grislis	Paralegal	0.2	Prepare and file transcript request for 1/17 case management conference
1/19/2023	Sabrina Grislis	Meet	0.8	Meet with team to prepare for MILs
1/20/2023	Sabrina Grislis	Communication	0.1	Email to court reporter Peggy regarding CMC Transcript
1/23/2023	Sabrina Grislis	Appearance/ Attend	6	Attend Tesla Securities trial to observe Musk testify and Spiro technique
1/30/2023	Sabrina Grislis	Draft/ Revise	1.3	Draft Plaintiff's deposition designations per Larry's notes on designations from last trial
1/30/2023	Sabrina Grislis	Draft/ Revise	0.8	Draft Plaintiff's discovery designations for new trial
1/31/2023	Sabrina Grislis	Draft/ Revise	0.4	Revise plaintiff's discovery designations and deposition designations per Larry Organ's feedback
1/31/2023	Sabrina Grislis	Communication	0.2	Send opposing counsel our pretrial exchange documents

Date	User	Activity	Time	Description
1/31/2023	Sabrina Grislis	Draft/ Revise	0.3	Finalize Plaintiff's pretrial documents by converting to PDF
1/31/2023	Sabrina Grislis	Draft/ Revise	0.3	Prepare Plaintiff's proposed exhibit list
1/31/2023	Sabrina Grislis	Draft/ Revise	0.2	Add time estimates to Plaintiff's witness list
1/31/2023	Sabrina Grislis	Draft/ Revise	0.2	Prepare the exhibits to Plaintiff's MILs
2/1/2023	Sabrina Grislis	File/ Serve	0.2	File notice of appearance of Marqui Hood
2/3/2023	Sabrina Grislis	File/ Serve	0.2	File Plaintiff's MILs and supporting documents via ECF
2/3/2023	Sabrina Grislis	Draft/ Revise	3.2	Edit and finalize Plaintiff's MILs, declaration of Nunley, and exhibits
2/6/2023	Sabrina Grislis	Draft/ Revise	0.8	Revise the exhibit list by adding in the deposition exhibit number and date
2/6/2023	Sabrina Grislis	Communication	0.1	Call with Larry Organ regarding additions to the the exhibit list
2/7/2023	Sabrina Grislis	Draft/ Revise	0.4	Insert the witness associations into the exhibit list
2/8/2023	Sabrina Grislis	Paralegal	0.1	Create Zoom meeting for trial team today
2/8/2023	Sabrina Grislis	Communication	0.1	Send Zoom meeting information to trial team for today's meeting
2/8/2023	Sabrina Grislis	Paralegal	0.4	Locate and download the videos for use with Trial Director of Demetric Diaz, Annalisa Heisen, Erin Marconi, and Kevin McGinn
2/8/2023	Sabrina Grislis	Meet	0.7	Meet with trial team to discuss future briefing, exchange documents
2/8/2023	Sabrina Grislis	Paralegal	0.9	Create the deposition designation videos for Demetric Di-az, Erin Marconi, Annalisa Heisen, and Kevin McGinn
2/8/2023	Sabrina Grislis	File/ Serve	0.1	File the Joint Witness List
2/8/2023	Sabrina Grislis	File/ Serve	0.1	File the Joint Exhibit list
2/8/2023	Sabrina Grislis	File/ Serve	0.1	File the proposed jury instructions
2/8/2023	Sabrina Grislis	Draft/ Revise	0.3	Edit the header, caption page, and signature block for the Joint Exhibit List
2/8/2023	Sabrina Grislis	Draft/ Revise	0.3	Edit the header, caption page, and signature block for the Joint Witness List
2/8/2023	Sabrina Grislis	Draft/ Revise	0.3	Edit the header, caption page, and signature block for the joint jury instructions
2/8/2023	Sabrina Grislis	Draft/ Revise	0.6	Combine Plaintiff's portions and Defendant's portions into the joint pretrial statement.
2/8/2023	Sabrina Grislis	Communication	0.2	Calls with Larry Organ regarding this evening's filings and status

Date	User	Activity	Time	Description
2/8/2023	Sabrina Grislis	Draft/ Revise	0.2	Finalize and convert to PDF for filing the joint exhibit list
2/8/2023	Sabrina Grislis	Draft/ Revise	0.2	Finalize and convert to PDF for filing the joint witness list
2/8/2023	Sabrina Grislis	Draft/ Revise	0.2	Finalize and convert to PDF for filing the joint jury instructions
2/8/2023	Sabrina Grislis	Review/ Analyze	0.6	Review the docket to determine the confidentiality status of exhibits to Plaintiff's MIL opp
2/9/2023	Sabrina Grislis	Paralegal	1.9	Review Plaintiff's MIL Opps and pull citations; review citations for what is confidential versus public
2/9/2023	Sabrina Grislis	Communication	0.1	Email to Larry Organ with the confidential citations in Plaintiff's MIL Opp
2/9/2023	Sabrina Grislis	Paralegal	0.3	Create audio files from the depositions of Owen Diaz
2/9/2023	Sabrina Grislis	Paralegal	0.5	Print proposed trial exhibits for client
2/9/2023	Sabrina Grislis	Paralegal	0.5	Review proposed joint exhibit list versus exhibit list for old trial. Locate old exhibit 380, create Defendant's newly created exhibit 380
2/9/2023	Sabrina Grislis	Communication	0.1	Notify Larry Organ that Defendant added a newly created exhibit, 380, to the joint exhibit list
2/9/2023	Sabrina Grislis	Paralegal	0.5	Create flashdrive to send to client with review documents
2/9/2023	Sabrina Grislis	Paralegal	0.2	Create FedEx label and send package to client
2/10/2023	Sabrina Grislis	Draft/ Revise	0.9	Prepare the exhibits to the declaration of Cimone Nunley in support of Plaintiff's MIL Opps
2/10/2023	Sabrina Grislis	Draft/ Revise	0.6	Prepare the table of contents and table of authorities in Plaintiff's MIL opps
2/10/2023	Sabrina Grislis	Draft/ Revise	0.3	Finalize by editing the caption, header, and signature block, check signatures and dates, and convert to PDF Plaintiff's MIL opps
2/10/2023	Sabrina Grislis	Draft/ Revise	0.2	Finalize by editing the caption, header, and signature block, check signatures and dates, convert to PDF, and combine with exhibits the declaration of Cimone Nunley in support of Plaintiff's MIL opp
2/10/2023	Sabrina Grislis	Draft/ Revise	0.3	Combine exhibits to Plaintiff's MIL opp
2/10/2023	Sabrina Grislis	Review/ Analyze	0.6	Review Plaintiff's MIL opp for additional citations and exhibits
2/10/2023	Sabrina Grislis	File/ Serve	0.2	File Plaintiff's MIL opp, declaration, and supporting exhibits
2/10/2023	Sabrina Grislis	Draft/ Revise	0.2	Finalize for filing the revised joint exhibit list
2/10/2023	Sabrina Grislis	File/ Serve	0.1	File the revised joint exhibit list

Date	User	Activity	Time	Description
2/13/2023	Sabrina Grislis	Research	2.5	Research witnesses
2/13/2023	Sabrina Grislis	Draft/ Revise	0.4	Draft chart for status of witness subpoenas
2/13/2023	Sabrina Grislis	Draft/ Revise	0.4	Draft cover letter to accompany subpoenas
2/13/2023	Sabrina Grislis	Paralegal	0.1	Create and send Zoom link to team
2/13/2023	Sabrina Grislis	Draft/ Revise	0.2	Begin drafting subpoena packet for service on Wayne Jackson
2/13/2023	Sabrina Grislis	Paralegal	0.5	Calculate witness fees based on estimated address/mileage for witnesses
2/13/2023	Sabrina Grislis	Draft/ Revise	0.3	Finalize for filing Plaintiff's discovery designations, Plaintiff's objections to Defendant's Designations of Di-az, and Plaintiff's deposition designations
2/13/2023	Sabrina Grislis	File/ Serve	0.2	File Plaintiff's Deposition Designations, Plaintiff's Discovery Designations, and Plaintiff's objections to Defendant's Designations of Demetric Di-az
2/13/2023	Sabrina Grislis	Paralegal	0.2	Save filed documents from this evening to the folder
2/14/2023	Sabrina Grislis	Meet	4.2	Meet with trial team (left early)
2/14/2023	Sabrina Grislis	Meet	1	Meet with Teodora Gagauz and Cameron Hartquist to discuss the focus group
2/14/2023	Sabrina Grislis	Paralegal	0.8	Select focus group participants
2/15/2023	Sabrina Grislis	Paralegal	0.1	Create zoom link, send to focus group participants
2/16/2023	Sabrina Grislis	Communication	0.2	Send Michael Rubin Word versions of Plaintiff's recent filings
2/16/2023	Sabrina Grislis	Paralegal	4.1	Create clips of Owen Diaz's deposition to show during focus group
2/16/2023	Sabrina Grislis	Communication	0.2	Send Larry Organ the running times of the video clips for focus group
2/16/2023	Sabrina Grislis	Paralegal	0.2	Send the confidentiality agreement to the focus group participants
2/16/2023	Sabrina Grislis	Appearance/ Attend	3.1	Attend the focus group (2.0), arrive early to monitor room, stay afterward for discussion and to pay participants
2/17/2023	Sabrina Grislis	Meet	0.6	Team meeting to discuss witnesses, exhibits, and trial plan
2/17/2023	Sabrina Grislis	Draft/ Revise	0.2	Fix formatting issues on the joint stipulation before filing
2/17/2023	Sabrina Grislis	Communication	0.1	Email to Mari Henderson regarding filing the joint stipulation
2/17/2023	Sabrina Grislis	File/ Serve	0.1	Serve the trial subpoenas to Victor Quintero and Ramon Martinez on counsel for Tesla

Date	User	Activity	Time	Description
2/17/2023	Sabrina Grislis	Draft/ Revise	0.1	Prepare the proof of service of the trial subpoenas to Quintero and Martinez on counsel for Tesla
2/17/2023	Sabrina Grislis	Communication	0.2	Email to Rob Goodstein requesting personal service of trial subpoenas and front of witness fee checks to Edward Romero, Michael Wheeler, and Wayne Jackson
2/17/2023	Sabrina Grislis	Draft/ Revise	0.3	Finalize the subpoenas and subpoena packets to Michael Wheeler, Wayne Jackson, Ed Romero, Ramon Martinez, and Victor Quintero
2/17/2023	Sabrina Grislis	Communication	0.1	Email the proposed order regarding the joint stipulation to Judge Orrick's P.O. email address
2/21/2023	Sabrina Grislis	Draft/ Revise	0.2	Prepare the subpoena to Edward Romero to serve on Counsel for Tesla
2/21/2023	Sabrina Grislis	File/ Serve	0.1	Serve the subpoena to Edward Romero on counsel for Tesla
2/22/2023	Sabrina Grislis	Communication	0.1	Send Dustin Collier the Zoom link for the meet and confer with counsel for Tesla
2/23/2023	Sabrina Grislis	Paralegal	2.5	Prepare binders for pretrial conference
2/23/2023	Sabrina Grislis	Communication	0.1	Email to Jean Perley requesting transcript
2/27/2023	Sabrina Grislis	Communication	0.1	Email to Larry Organ and Cimone Nunley with my questions for Judge Orrick at pretrial conference
2/27/2023	Sabrina Grislis	Paralegal	0.5	Revise the survey and post the craigslist ads for Thursday's focus group
2/27/2023	Sabrina Grislis	Draft/ Revise	0.2	Draft Plaintiff's daily transcript order form
2/27/2023	Sabrina Grislis	Communication	0.1	Call to Larry Organ regarding the pretrial conference
2/27/2023	Sabrina Grislis	File/ Serve	0.2	File Plaintiff's transcript order form for daily trial transcripts
2/28/2023	Sabrina Grislis	Communication	0.1	Call with Larry Organ regarding Diaz witnesses
2/28/2023	Sabrina Grislis	Communication	0.1	Email to Rob Goodstein regarding service on Jackson and Wheeler
2/28/2023	Sabrina Grislis	Paralegal	0.8	Review survey responses to select focus group participants
2/28/2023	Sabrina Grislis	Communication	0.8	Call focus group participants to confirm selection
3/1/2023	Sabrina Grislis	Communication	0.5	Follow up with focus group participants; email confirmation notice
3/2/2023	Sabrina Grislis	Draft/ Revise	0.2	Prepare the subpoena and proof of service of Jackson subpoena on nextSource counsel
3/2/2023	Sabrina Grislis	Draft/ Revise	0.1	Draft the email serving the Wayne Jackson subpoena on nextSource counsel
3/2/2023	Sabrina Grislis	File/ Serve	0.1	Serve the subpoena to Wayne Jackson on nextSource

Date	User	Activity	Time	Description
3/2/2023	Sabrina Grislis	Meet	2.8	Meet with trial team
3/2/2023	Sabrina Grislis	Communication	0.2	Follow up with focus group participants regarding the confidentiality agreements
3/2/2023	Sabrina Grislis	Communication	0.3	Send confidentiality agreements to participants of tonight's focus group
3/2/2023	Sabrina Grislis	Appearance/ Attend	2	Attend the focus group
3/2/2023	Sabrina Grislis	Meet	1	Meet with team after the focus group to debrief
3/2/2023	Sabrina Grislis	Paralegal	0.3	Start focus group early to monitor zoom room
3/2/2023	Sabrina Grislis	Paralegal	0.4	Prepare clip of Demetric Di-az to use in this evening's focus group
3/4/2023	Sabrina Grislis	Appearance/ Attend	3	Attend focus group
3/4/2023	Sabrina Grislis	Meet	1.6	Meet with team to debrief after focus group
3/4/2023	Sabrina Grislis	Paralegal	0.3	Start focus group early to manage room
3/6/2023	Sabrina Grislis	Paralegal	0.3	Book rooms for Cimone Nunley and Marqui Hood
3/6/2023	Sabrina Grislis	Communication	0.1	Send Cimone Nunley the chart of Annalisa Heisen's trial testimony
3/6/2023	Sabrina Grislis	Communication	0.1	Email to Diaz team to organize who needs an exhibit binder
3/7/2023	Sabrina Grislis	Communication	0.2	Call with Richard Duvall regarding Plaintiff's trial transcript request
3/7/2023	Sabrina Grislis	Communication	0.1	Email to Ruth Ekahus regarding the transcript from the pretrial conference
3/7/2023	Sabrina Grislis	Paralegal	1.1	Begin preparing exhibit binders
3/8/2023	Sabrina Grislis	Paralegal	0.2	Post Craigslist ads for March 13 focus group
3/8/2023	Sabrina Grislis	Meet	0.9	Meet with trial team
3/8/2023	Sabrina Grislis	Paralegal	0.1	Pull the motion for new trial from the Littleton case
3/8/2023	Sabrina Grislis	Communication	0.1	Confirm availability with Dustin Collier for witness exam meeting
3/8/2023	Sabrina Grislis	Communication	0.1	Send motion for new trial to Michael Rubin and Larry Organ
3/8/2023	Sabrina Grislis	Communication	0.1	Follow up with Rob Goodstein regarding status of service on Michael Wheeler
3/8/2023	Sabrina Grislis	Research	0.1	Find Jackelin Delgado's Facebook and Instagram



Date	User	Activity	Time	Description
3/8/2023	Sabrina Grislis	Communication	0.1	Send Cimone Nunley links to Jackelin Delgado's social media accounts
3/9/2023	Sabrina Grislis	Communication	0.1	Respond to Dustin Collier regarding the outline for Amy Oppenheimer
3/10/2023	Sabrina Grislis	Communication	0.2	Respond to Mario Gutierrez regarding Plaintiff's experts' demonstratives; deposition transcripts for trial; trial transcripts for retrial
3/13/2023	Sabrina Grislis	Appearance/ Attend	2	Attend focus group
3/13/2023	Sabrina Grislis	Paralegal	0.2	Begin focus group early to monitor room
3/13/2023	Sabrina Grislis	Meet	0.7	Meet with team after focus group
3/13/2023	Sabrina Grislis	Communication	0.1	Send confidentiality agreements to participants
3/13/2023	Sabrina Grislis	Communication	0.1	Follow up with focus group participants
3/13/2023	Sabrina Grislis	Communication	0.1	Follow up with Rob regarding service of trial subpoenas
3/13/2023	Sabrina Grislis	Paralegal	0.1	Create post focus group survey
3/14/2023	Sabrina Grislis	Communication	0.1	Call with Wayne Jackson regarding trial
3/14/2023	Sabrina Grislis	Communication	0.1	Follow up call to Wayne Jackson, sent text
3/14/2023	Sabrina Grislis	Communication	0.1	Call to Michael Wheeler, left voicemail
3/14/2023	Sabrina Grislis	Communication	0.1	Call to Larry Organ regarding my call with Wayne Jackson, left voicemail
3/14/2023	Sabrina Grislis	Communication	0.1	Call with Larry Organ and Dustin Collier regarding my conversation with Wayne Jackson
3/14/2023	Sabrina Grislis	Paralegal	0.9	Prepare TrialDirector video of Demetric Di-az
3/14/2023	Sabrina Grislis	Draft/ Revise	0.7	Draft the list of designations of Demetric Di-az's deposition testimony by party, add time for each clip
3/14/2023	Sabrina Grislis	Draft/ Revise	1.1	Draft list of designations of Erin Marconi's deposition testimony by party, add times for each clip
3/14/2023	Sabrina Grislis	Paralegal	0.8	Begin to prepare TrialDirector video of Erin Marconi
3/14/2023	Sabrina Grislis	Draft/ Revise	0.6	Draft the list of designations of Annalisa Heisen's deposition testimony by party, add times for each clip
3/14/2023	Sabrina Grislis	Draft/ Revise	0.2	Draft the list of designations of Kevin McGinn's deposition testimony by party, add times for each clip
3/14/2023	Sabrina Grislis	Paralegal	0.2	Add audio files of Owen Diaz's depositions to shared Drive



Date	User	Activity	Time	Description
3/14/2023	Sabrina Grislis	Communication	0.1	Email to Owen Diaz about audio files
3/14/2023	Sabrina Grislis	Communication	0.1	Email to Dustin Collier and Larry Organ with Wayne Jackson's contact information
3/14/2023	Sabrina Grislis	Communication	0.2	Email Wayne Jackson the subpoena and his trial testimony; send standby agreement for signature via AdobeSign
3/14/2023	Sabrina Grislis	Communication	0.1	Send Larry Organ the subpoena and standby agreement for Michael Wheeler
3/14/2023	Sabrina Grislis	Communication	0.1	Email Rob Goodstein to call off service of Michael Wheeler
3/14/2023	Sabrina Grislis	Communication	0.1	Email to Kathy and Cyril at Bridget Mattos and Associates requesting the synced deposition video of Michael Wheeler
3/14/2023	Sabrina Grislis	Draft/ Revise	0.1	Draft letter for witness La'Drea Jones
3/14/2023	Sabrina Grislis	Communication	0.1	Send La'Drea Jones her cover letter and subpoena
3/14/2023	Sabrina Grislis	Research	0.1	Research case Dickson v. Tesla on Santa Clara County Court's website
3/14/2023	Sabrina Grislis	Research	0.1	Research case Dickson v Tesla on ECF, Northern District; get docket report
3/14/2023	Sabrina Grislis	Communication	0.1	Send findings regarding Dickson v Tesla to Larry Organ
3/15/2023	Sabrina Grislis	Paralegal	0.2	Begin downloading the recordings from previous focus groups
3/16/2023	Sabrina Grislis	Paralegal	3.2	Prepare deposition videos to present in trial
3/17/2023	Sabrina Grislis	Paralegal	0.6	Begin narrowing down focus group participants
3/17/2023	Sabrina Grislis	Communication	0.1	Email Cameron Hartquist instructions for focus group selection
3/17/2023	Sabrina Grislis	Meet	5.1	Meet with team to discuss trial strategy
3/17/2023	Sabrina Grislis	Paralegal	0.5	Select focus group alternates and make contact
3/17/2023	Sabrina Grislis	Communication	0.1	Email to court reporter supervisor Kristen Melen regarding Realtime
3/17/2023	Sabrina Grislis	Draft/ Revise	0.8	Create demonstratives
3/18/2023	Sabrina Grislis	Paralegal	2.1	Prepare exhibit binders
3/18/2023	Sabrina Grislis	Communication	0.1	Send confidentiality agreements via AdobeSign
3/18/2023	Sabrina Grislis	Communication	0.2	Follow up with focus group participants
3/18/2023	Sabrina Grislis	Appearance/ Attend	3	Attend focus group

Date	User	Activity	Time	Description
3/18/2023	Sabrina Grislis	Paralegal	0.2	Begin focus group early to monitor room
3/19/2023	Sabrina Grislis	Paralegal	0.5	Revise deposition videos of Demetric Diaz and Erin Marconi
3/20/2023	Sabrina Grislis	Draft/ Revise	1.4	Draft the list of the deposition designations of the videos of Demetric Di-az, Annalisa Heisen, Erin Marconi, and Kevin McGinn in trial director
3/20/2023	Sabrina Grislis	Plan/ Prepare	4.1	Fine tune the deposition videos of Demetric Di-az, Annalisa Heisen, Erin Marconi, and Kevin McGinn in trial director
3/20/2023	Sabrina Grislis	Paralegal	0.2	Send payment to focus group participant
3/20/2023	Sabrina Grislis	Plan/ Prepare	1.2	Prepare exhibit binders
3/20/2023	Sabrina Grislis	Paralegal	0.1	Provide subpoena and standby agreement for Michael Wheeler
3/20/2023	Sabrina Grislis	Paralegal	0.4	Finish selecting focus group participants
3/21/2023	Sabrina Grislis	Paralegal	0.1	Send Bernard Alexander the printer driver software
3/21/2023	Sabrina Grislis	Draft/ Revise	0.6	Create polls on Zoom for focus group
3/21/2023	Sabrina Grislis	Communication	0.1	Email to Dustin Collier and Larry Organ regarding using polling for tonight's focus group
3/21/2023	Sabrina Grislis	Meet	2.1	Meet with Dustin Collier and Cimone Nunley to practice timing of exam rehearsals
3/21/2023	Sabrina Grislis	Draft/ Revise	0.2	Revise the exhibit list
3/21/2023	Sabrina Grislis	Communication	0.1	Send the revised exhibit list to Larry Organ for review
3/21/2023	Sabrina Grislis	Appearance/ Attend	3	Attend focus group. Log in early to monitor room. Stay on after to debrief and send payment to participants
3/22/2023	Sabrina Grislis	Communication	0.1	Send Elizabeth Malay the zoom link
3/22/2023	Sabrina Grislis	Communication	0.1	Send Marqui Hood, Cimone Nunley, and Elizabeth Malay the Zoom link
3/22/2023	Sabrina Grislis	Paralegal	4.1	Prepare exhibit binders for trial
3/22/2023	Sabrina Grislis	Communication	0.1	Send the further revised exhibit list to counsel for Tesla
3/22/2023	Sabrina Grislis	Communication	0.1	Email to Jean Davis regarding scheduling set up/supply drop off in courtroom
3/23/2023	Sabrina Grislis	Paralegal	0.1	Run PeopleMap report on Tamotsu Kawasaki
3/23/2023	Sabrina Grislis	Communication	0.1	Send PeopleMap report to Dustin Collier and Larry Organ

Date	User	Activity	Time	Description
3/23/2023	Sabrina Grislis	Communication	0.1	Email to court reporter Marla Knox regarding payment for trial transcripts.
3/23/2023	Sabrina Grislis	Paralegal	2.1	Finish preparing the exhibit binders
3/23/2023	Sabrina Grislis	Communication	0.2	Email to trial team about coordinating driving to San Francisco
3/24/2023	Sabrina Grislis	Appearance/ Attend	3.1	Travel to San Francisco to drop off supplies at courtroom; set up supplies in courtroom and test the technology; return to office.
3/24/2023	Sabrina Grislis	Communication	0.2	Contact potential focus group participants
3/25/2023	Sabrina Grislis	Paralegal	0.3	Dropoff exhibit binder to Michael Rubin's home
3/25/2023	Sabrina Grislis	Appearance/ Attend	3	Attend focus group. Join focus group early to monitor room. Stay on after to debrief and send payment to participants.
3/25/2023	Sabrina Grislis	Communication	0.1	Send confidentiality agreement to focus group participants
3/25/2023	Sabrina Grislis	Communication	0.1	Send Zoom link for trial to team
3/25/2023	Sabrina Grislis	Communication	0.1	Email team a reminder that Judge Orrick requires masks in his courtroom
3/26/2023	Sabrina Grislis	Meet	1.1	Meet with team to practice opening statement. Practice tech.
3/26/2023	Sabrina Grislis	Paralegal	0.3	Review opening statement notes and power point
3/26/2023	Sabrina Grislis	Communication	0.1	Email Tamotsu Kawasaki his trial subpoena
3/27/2023	Sabrina Grislis	Appearance/ Attend	11.5	Travel to San Francisco for trial. Attend day one of trial. Travel back after trial.
3/27/2023	Sabrina Grislis	Communication	0.1	Email Plaintiff's witnesses for Tuesday to opposing counsel
3/28/2023	Sabrina Grislis	Appearance/ Attend	8.5	Travel to San Francisco for trial. Attend trial. Travel back to office.
3/28/2023	Sabrina Grislis	Communication	0.1	Send day 1 trial transcripts to team
3/28/2023	Sabrina Grislis	Communication	0.1	Email to Marla Knox requesting that she include Cimone Nunley on her emails
3/28/2023	Sabrina Grislis	Communication	0.1	Send Dustin Collier and Larry Organ the designations for Erin Marconi for review and finalizing.
3/28/2023	Sabrina Grislis	Communication	0.1	Send list of Wednesday's witnesses to opposing counsel
3/28/2023	Sabrina Grislis	Communication	0.1	Email to opposing counsel updating Plaintiff's witness order for Wednesday
3/28/2023	Sabrina Grislis	Draft/ Revise	0.2	Draft exhibit 140, the designations of Erin Marconi
3/28/2023	Sabrina Grislis	Draft/ Revise	0.1	Revise exhibit 140 after noticing errors

Date	User	Activity	Time	Description
3/28/2023	Sabrina Grislis	Paralegal	0.4	Review the deposition video of Erin Marconi for accuracy.
3/29/2023	Sabrina Grislis	Appearance/ Attend	8.4	Travel to San Francisco for trial, attend trial, travel back to office.
3/29/2023	Sabrina Grislis	Communication	0.1	Send updated exhibit 140 to Asher Griffin
3/29/2023	Sabrina Grislis	Research	0.2	Research the Youtube account that Defense counsel referred to
3/29/2023	Sabrina Grislis	Communication	0.1	Send Youtube findings to Cimone Nunley
3/29/2023	Sabrina Grislis	Communication	0.1	Send Zoom link to team for debrief
3/29/2023	Sabrina Grislis	Communication	0.1	Send Judge's Zoom link to team for their 3 pm hearing
3/29/2023	Sabrina Grislis	Communication	0.1	Email to Kris Organ requesting he submit payment on open invoices
3/29/2023	Sabrina Grislis	Meet	0.7	Meet with team to debrief (left early)
3/29/2023	Sabrina Grislis	Communication	0.1	Forward the day's trial transcripts to the team
3/29/2023	Sabrina Grislis	Communication	0.2	Email to Larry Organ regarding the designations of Demetric Diaz's deposition testimony
3/30/2023	Sabrina Grislis	Appearance/ Attend	8.7	Travel to San Francisco for trial, attend trial, travel back to office.
3/30/2023	Sabrina Grislis	Meet	0.8	Meet with team to debrief and discussing closing
3/30/2023	Sabrina Grislis	Paralegal	0.1	Send Zoom link to team for debrief meeting
3/30/2023	Sabrina Grislis	Paralegal	0.2	Prepare binder for Cimone
3/30/2023	Sabrina Grislis	Paralegal	0.1	Prepare final exhibits binder
3/30/2023	Sabrina Grislis	Communication	0.1	Forward trial transcripts to team; send text message that I sent the transcripts
3/30/2023	Sabrina Grislis	Communication	0.1	Coordinate with Charles Mahla regarding his appearance via Zoom
3/31/2023	Sabrina Grislis	Appearance/ Attend	11.4	Travel to San Francisco for trial, attend trial, travel home.
4/3/2023	Sabrina Grislis	Appearance/ Attend	7.5	Travel to San Francisco, wait for jury to finish deliberating and hear verdict, travel back to office.
4/4/2023	Sabrina Grislis	Communication	0.1	Communication with Wayne Jackson regarding witness fees
4/4/2023	Sabrina Grislis	Communication	0.1	Communication with Michael Wheeler regarding witness fees
4/4/2023	Sabrina Grislis	Communication	0.1	Phone call with Larry Organ regarding witness fees for Michael Wheeler and Wayne Jackson

Date	User	Activity	Time	Description
4/5/2023	Sabrina Grislis	Meet	1.2	Meet with team to discuss next steps on case
4/5/2023	Sabrina Grislis	Research	1.2	Research jurors on PeopleMap to find contact information
4/5/2023	Sabrina Grislis	Communication	0.1	Email Marqui Hood with my juror research findings
4/20/2023	Sabrina Grislis	Communication	0.1	Email to focus group participant
4/20/2023	Sabrina Grislis	Communication	0.1	Send Marla Knox's W-9 to bookkeeper
4/24/2023	Sabrina Grislis	Communication	0.2	Email to Kris Organ clarifying the payments to MK Litigation
4/24/2023	Sabrina Grislis	Communication	0.1	Share additional expenses with Cimone Nunley
6/28/2023	Sabrina Grislis	Communication	0.1	Send Corinne Johnson Demetric Di-az's testimony exhibit
7/24/2023	Sabrina Grislis	Communication	0.1	Email to Cimone Nunley and Larry Organ about dismissal of state court parties
8/8/2023	Sabrina Grislis	File/ Serve	0.2	File Plaintiff's notice of new evidence
8/15/2023	Sabrina Grislis	Paralegal	0.2	Save Defendant's opposition to notice of new evidence to file
8/16/2023	Sabrina Grislis	Meet	0.5	Meet with team to discuss reply brief re new evidence
8/16/2023	Sabrina Grislis	Research	0.4	Investigate job titles of individuals identified in evidence in new evidence [email chain re graffiti]
8/18/2023	Sabrina Grislis	File/ Serve	0.2	File Plaintiff's request for leave to file reply
8/18/2023	Sabrina Grislis	Paralegal	0.2	Save ECF filed documents- reply brief re notice of new evidence
8/18/2023	Sabrina Grislis	Draft/ Revise	2.5	Draft administrative motion to seal documents and supporting declaration
8/18/2023	Sabrina Grislis	Communication	0.3	Communications with Molly Durkin regarding administrative motion to seal
8/18/2023	Sabrina Grislis	Draft/ Revise	2.2	Draft the administrative motion to consider whether documents should be sealed per Jean Perley's research
8/18/2023	Sabrina Grislis	Communication	0.1	Email to Michael Rubin regarding declaration ISO administrative motions to seal
8/18/2023	Sabrina Grislis	Draft/ Revise	0.1	Draft the Proof of Service re unredacted documents ISO Plaintiff's notice of new evidence
8/18/2023	Sabrina Grislis	Communication	0.1	Email the word version of the proposed order unsealing new evidence to clerk
7/21/2023	Sabrina Grislis	File/ Serve	1	(State Court) OneLegal order no. 20849181, file CMS

Date	User	Activity	Time	Description
12/14/2022	Cameron Hartquist	Communication	0.1	Printing transcript emails for Larry and communicating with Sabrina.
12/14/2022	Cameron Hartquist	Communication	0.7	Coordinating and mailing check for transcripts from 12/07/22. Communicating via email with Larry Organ and Sabrina Grislis.
1/4/2023	Cameron Hartquist	Plan/ Prepare	0.1	Saving MK Transcript Check FedEx charge to file.
2/14/2023	Cameron Hartquist	Communication	1	Calling potential focus group participants.
2/15/2023	Cameron Hartquist	Plan/ Prepare	1.1	Calling and updating spreadsheet for focus group participants and emailing Sabrina.
2/16/2023	Cameron Hartquist	Meet	3	Focus group prep, meeting, and debrief.
2/20/2023	Cameron Hartquist	Plan/ Prepare	0.6	Craigslist ad posting and focus group planning
2/22/2023	Cameron Hartquist	Plan/ Prepare	1.2	Selecting focus group participants and updating spreadsheets.
2/23/2023	Cameron Hartquist	Communication	2	Focus group participant planning and contacting.
2/24/2023	Cameron Hartquist	Communication	3.3	Focus group planning and communicating with Teo. Calls to participants and sending Zoom link emails.
2/25/2023	Cameron Hartquist	Communication	0.4	Saving confidentiality agreements and contacting focus group participants.
2/26/2023	Cameron Hartquist	Draft/ Revise	0.2	Drafting post focus group email.
2/26/2023	Cameron Hartquist	Draft/ Revise	0.8	Drafting focus group survey and communicating with Larry about questions.
2/26/2023	Cameron Hartquist	Meet	4.6	Focus group prep and moderating group. Sending post group survey.
2/27/2023	Cameron Hartquist	Other	0.1	Saving Zoom recording to folder.
2/28/2023	Cameron Hartquist	Other	0.5	Updating focus group lists and downloading survey responses.
3/1/2023	Cameron Hartquist	Communication	0.3	Saving focus group results and messaging Cimone
3/17/2023	Cameron Hartquist	Plan/ Prepare	2.5	Focus group participant selection.
3/20/2023	Cameron Hartquist	Communication	3	Focus group participant selection and prep
3/21/2023	Cameron Hartquist	Plan/ Prepare	1.1	Setting up Elmo video software.
3/21/2023	Cameron Hartquist	Communication	3.5	Focus group participant prep and communication.
3/22/2023	Cameron Hartquist	Plan/ Prepare	0.8	Binders
3/22/2023	Cameron Hartquist	Plan/ Prepare	1.5	Jury research.
3/22/2023	Cameron Hartquist	Plan/ Prepare	0.5	Jury selection

Date	User	Activity	Time	Description
3/22/2023	Cameron Hartquist	Plan/ Prepare	0.7	Binder preparation
3/23/2023	Cameron Hartquist	Plan/ Prepare	1.5	Trial director training from Sabrina and witness binder preparation.
3/23/2023	Cameron Hartquist	Plan/ Prepare	0.8	Witness binder preparation.
3/24/2023	Cameron Hartquist	Travel Expense	4.1	Travel to courthouse to deliver trial equipment and exhibits
3/24/2023	Cameron Hartquist	Communication	2.5	Focus group preparation
3/24/2023	Cameron Hartquist	Communication	0.2	Emailing focus group participants. Updating spreadsheets.

Date	User	Activity	Time	Description
1/4/2023	Marqui Hood	Communication	1.3	Diaz strategy meeting
1/6/2023	Marqui Hood	Draft/ Revise	0.3	Reviewing proposed jury instructions
1/6/2023	Marqui Hood	Review/ Analyze	0.5	reviewing prior hearing & evid re: strategy mtg
1/19/2023	Marqui Hood	Communication	0.7	Strategy call with co counsel re: MILs & meet and confer with Tesla
1/19/2023	Marqui Hood	Review/ Analyze	0.5	Reviewing trial testimony
1/23/2023	Marqui Hood	Draft/ Revise	0.5	Review of MILs
1/23/2023	Marqui Hood	Research	2	Researching PMK replacement testimony issue
1/26/2023	Marqui Hood	Research	1.4	Researching pursuing equitable relief at retrial, former ee status, other possible avenues.
1/26/2023	Marqui Hood	Communication	0.7	Call w/ co-counsel re: PMK substitution/due process, employer/contractor
1/30/2023	Marqui Hood	Review/ Analyze	2.6	Reviewing trial transcripts
2/1/2023	Marqui Hood	Communication	1.8	Strategy meeting Tesla's MILs, etc.
2/2/2023	Marqui Hood	Communication	2.3	Meet and Confer call with D counsel & post call strategy session
2/2/2023	Marqui Hood	Draft/ Revise	1.6	Review of PMK depo and edit/draft FN for MIL 2
2/2/2023	Marqui Hood	Review/ Analyze	1	Reviewing PMK depo re: MIL 2
2/6/2023	Marqui Hood	Review/ Analyze	0.3	Review of Hurtado & Donet transcripts re: MILS
2/6/2023	Marqui Hood	Communication	0.3	Reviewing emails
2/6/2023	Marqui Hood	Review/ Analyze	4.4	Review of record re: Tesla's assertion that puni liability is at issue at retrial
2/7/2023	Marqui Hood	Review/ Analyze	1.8	Review of record for add'l citations to add to brief re: punitive damages liability/verdict form
2/7/2023	Marqui Hood	Draft/ Revise	2.1	Edits & redrafting punitive damages briefing re verdict form
2/8/2023	Marqui Hood	Draft/ Revise	0.3	Reviewing/edits to punis brief
2/8/2023	Marqui Hood	Communication	0.8	Team meeting
2/8/2023	Marqui Hood	Communication	0.7	Call with co counsel re punis addendum
2/13/2023	Marqui Hood	Communication	0.9	Strategy Call re: joint pretrial statement



Date	User	Activity	Time	Description
2/14/2023	Marqui Hood	Communication	2.3	Team strategy meeting
2/14/2023	Marqui Hood	Communication	2.2	Team Strategy session -- afternoon session
2/14/2023	Marqui Hood	Review/ Analyze	0.5	reviewing joint pretrial stmt prior to strategy session
2/15/2023	Marqui Hood	Communication	0.5	Strategy call re: stips meet & confer w/ co counsel
2/15/2023	Marqui Hood	Communication	0.8	Meet and confer w/ Tesla re: stips and referencing "prior trial"
2/16/2023	Marqui Hood	Review/ Analyze	0.4	Doc production review for news tip email
2/16/2023	Marqui Hood	Review/ Analyze	0.7	Review of focus group script & email suggestions
2/16/2023	Marqui Hood	Communication	0.1	Call with Durkin, Organ re: strategy
2/16/2023	Marqui Hood	Plan/ Prepare	1.7	Diaz: Focus group with Organ
2/17/2023	Marqui Hood	Communication	0.7	Team meeting with Organ, Alexander, Collier, Nunley
2/17/2023	Marqui Hood	Communication	0.1	Email to Organ re: rebuttal wits to Tesla's HR wit
2/20/2023	Marqui Hood	Review/ Analyze	1.6	Reviewing decs for rebuttal evidence to PMQ testimony
2/20/2023	Marqui Hood	Review/ Analyze	1.7	Reviewing decs re: rebuttal evidence for PMK testimony re: preventative measures
2/21/2023	Marqui Hood	Communication	0.1	Call to Ellen Pansky re ethics consult
2/21/2023	Marqui Hood	Review/ Analyze	1.4	Reviewing Heisen deposition
2/21/2023	Marqui Hood	Review/ Analyze	1.1	Reviewing Heisen depo & exhibits
2/22/2023	Marqui Hood	Communication	0.2	Email to ethics counsel Erin Joyce
2/22/2023	Marqui Hood	Communication	0.1	Call with Durkin re; M&C
2/22/2023	Marqui Hood	Plan/ Prepare	0.3	Review of joint pretrial stmt prep for M&C call with defense counsel
2/22/2023	Marqui Hood	Communication	0.5	M&C call with Organ, Rubin, Alexander, Nunley, Collier & D counsel re: reference to prior trial
2/22/2023	Marqui Hood	Communication	0.4	Post M&C call call w/ Organ, Alexander, Rubin, Nunley, Collier
2/22/2023	Marqui Hood	Communication	0.2	Intake call with admin re Ellen Pansky
2/22/2023	Marqui Hood	Research	0.4	Legal research re: propriety of mentioning prior trial at retrial

Date	User	Activity	Time	Description
2/23/2023	Marqui Hood	Research	0.7	Caselaw research re: mention of prior trial at retrial
2/23/2023	Marqui Hood	Research	1.3	Researching instructing 2nd jury re 1st "jury determination" issue
2/23/2023	Marqui Hood	Draft/ Revise	2.3	Drafting briefing re: "determination" v "verdict"
2/23/2023	Marqui Hood	Communication	0.1	email to Rubin re: foundation question
2/23/2023	Marqui Hood	Communication	0.1	Call with Organ re: ethics & prior jury briefing
2/24/2023	Marqui Hood	Draft/ Revise	0.8	Final edits to briefing re mention of prior trial
2/24/2023	Marqui Hood	Communication	0.5	Pretrial Conference strategy call with Organ, Alexander, Nunley, Rosenthal, Rubin
2/24/2023	Marqui Hood	Draft/ Revise	0.2	final edits to prior verdict briefing
2/24/2023	Marqui Hood	Plan/ Prepare	0.2	Reviewing Pansky retainer agreement re: ethics consult & email to Organ, Stanford, Grislis
2/24/2023	Marqui Hood	Communication	0.1	call with Larry Organ re: Pansky consult
2/26/2023	Marqui Hood	Plan/ Prepare	3	Attending focus group
2/27/2023	Marqui Hood	Communication	0.1	Call with Durkin RE Diaz status
2/27/2023	Marqui Hood	Appearance/ Attend	1.5	Attending pretrial conference
2/27/2023	Marqui Hood	Communication	0.2	Post hearing call with Larry Organ, Dustin Collier, and Cimone Nunley
3/2/2023	Marqui Hood	Review/ Analyze	1	Reviewing materials/arguments re: Tesla's jury instruction redline, Tesla's request to exclude Wheeler testimony
3/2/2023	Marqui Hood	Plan/ Prepare	2.7	Strategy meeting with Larry Organ, Cimone Nunley, Dustin Collier, Sabrina Grislis etc
3/2/2023	Marqui Hood	Review/ Analyze	0.8	Reviewing docs re: Wheeler proffer: MILs, Diaz & Wheeler testimony
3/2/2023	Marqui Hood	Review/ Analyze	0.2	Review of proposed jury instruction briefing
3/2/2023	Marqui Hood	Review/ Analyze	0.4	Review of focus group script
3/2/2023	Marqui Hood	Plan/ Prepare	2	Attending focus group
3/3/2023	Marqui Hood	Communication	0.2	Email to the team re: Wheeler proffer
3/3/2023	Marqui Hood	Draft/ Revise	0.4	Edits to Wheeler proffer
3/4/2023	Marqui Hood	Plan/ Prepare	4.5	focus group and analysis with Larry Organ team and Dustin Collier Law team

Date	User	Activity	Time	Description
3/8/2023	Marqui Hood	Communication	1	Strategy meeting with Larry Organ, Cimone Nunley, Dustin Collier, Elizabeth Malay, V. Joshua Socks, Sabrina Grislis
3/13/2023	Marqui Hood	Plan/ Prepare	1.8	Observing/feedback re: cross exam of Owen Diaz
3/13/2023	Marqui Hood	Plan/ Prepare	2.7	Focus group & analysis: Larry Organ, Sabrina Grislis, Cimone Nunley, Dustin Collier, etc.
3/18/2023	Marqui Hood	Plan/ Prepare	4.5	Focus group & strategy session -- Larry Organ, Cimone Nunley, Dustin Collier+team, Emily Kohlheim
3/21/2023	Marqui Hood	Plan/ Prepare	2.8	Focus group & strategy meeting
3/22/2023	Marqui Hood	Communication	2.2	Strategy meeting: Larry Organ, Bernard Alexander, Michael Rubin, Cimone Nunley, Jonathan Rosenthal, Dustin Collier etc.
3/22/2023	Marqui Hood	Plan/ Prepare	1.5	Team meeting with Plotkin, Larry Organ, Dustin Collier, Bernard Alexander, Cimone Nunley re: jury pool. Discussions of demonstratives.
3/22/2023	Marqui Hood	Research	1.8	Research re: potential juror/juror survey
3/22/2023	Marqui Hood	Plan/ Prepare	1.3	Team meeting with Larry Organ, Bernard Alexander, Dustin Collier, Cimone Nunley, Jonathan Rosenthal, Sabrina Grislis, LM, etc.
3/25/2023	Marqui Hood	Draft/ Revise	5	sope of exam chart
3/29/2023	Marqui Hood	Review/ Analyze	0.3	Review of complaint re: Timbreza related references
3/29/2023	Marqui Hood	Review/ Analyze	0.8	Diaz depo review re: LaDrea tesla application testimony/open/strategizing direct of LaDrea.
3/29/2023	Marqui Hood	Draft/ Revise	0.4	assist w/ pocket brief re: MIL violation/conviction
3/30/2023	Marqui Hood	Review/ Analyze	1.1	Review of Owen's 3/39 testimony to prep for redirect.
3/31/2023	Marqui Hood	Draft/ Revise	7.8	motion for retrial legal research & drafting
4/5/2023	Marqui Hood	Communication	1.2	Strategy meeting: Larry Organ, Cimone Nunley, Dustin Collier, Michael Rubin, Jonathan Rosenthal, Molly Durkin etc.
4/5/2023	Marqui Hood	Draft/ Revise	0.5	Drafting juror interview questions
4/6/2023	Marqui Hood	Communication	0.2	Calling jurors: spoke with Juror 3 - rescheduled call
4/7/2023	Marqui Hood	Communication	0.4	Contacting jurors
4/7/2023	Marqui Hood	Communication	0.3	Contacting jurors
4/10/2023	Marqui Hood	Communication	0.1	Call to juror 3, receipt of text, email to team
4/11/2023	Marqui Hood	Communication	0.4	Juror calls & emails

Date	User	Activity	Time	Description
4/11/2023	Marqui Hood	Communication	0.2	Juror calls & emails
4/12/2023	Marqui Hood	Review/ Analyze	0.1	Review of stip re: attys fee motion
4/12/2023	Marqui Hood	Communication	0.1	Email to ethics counsel Pansky
4/14/2023	Marqui Hood	Communication	0.7	Fee motion meeting w/ Cimone Nunley, Michael Rubin, Dustin Collier, LO
4/24/2023	Marqui Hood	Communication	0.1	Email to Michael Rubin, Jonathan Rosenthal, Larry Organ, Cimone Nunley, Bernard Alexander, and Dustin Collier re Dr. Reading's testimony
5/1/2023	Marqui Hood	Communication	0.5	Calling & emailing jurors to solicit feedback. Convo with Ivana Kalabkova's daughter.
5/2/2023	Marqui Hood	Communication	0.6	Texts/call with Juror AnnaMarie Livesey
5/2/2023	Marqui Hood	Communication	0.3	Review of notes & email to team re: juror interview
5/2/2023	Marqui Hood	Draft/ Revise	0.5	Drafting juror decl.,
5/2/2023	Marqui Hood	Research	0.2	Researching Fed law re juror decl.
5/2/2023	Marqui Hood	Draft/ Revise	0.2	Edits to Juror dec. based on Cimone Nunley research & circulating to team
5/2/2023	Marqui Hood	Communication	0.2	Call with Larry Organ and Cimone Nunley re: juror decl.
5/3/2023	Marqui Hood	Draft/ Revise	0.3	Edits to juror declaration, email to Cimone Nunley + team re: changes necessary to file under seal
5/4/2023	Marqui Hood	Communication	0.1	Review of Juror 22 email re: dec & email to team explaining communication
6/27/2023	Marqui Hood	Draft/ Revise	0.9	Checking citations re: Motion for new trial
6/28/2023	Marqui Hood	Draft/ Revise	2	Motion for new trial, confirming & editing cites
6/28/2023	Marqui Hood	Draft/ Revise	0.6	Checking cites/edits to Opp for new trial
7/6/2023	Marqui Hood	Communication	0.1	email to team re: Reading (Larry Organ, Dustin Collier, Bernard Alexander, Cimone Nunley, Michael Rubin, Jonathan Rosenthal, Sabrina Grislis)
8/16/2023	Marqui Hood	Review/ Analyze	0.8	Review & analysis of Tesla's brief responding to Diaz's new evidence argument. Prep for team call.
8/16/2023	Marqui Hood	Communication	0.5	Team mtg -- re: submitting request for reply brief re: new evidence briefing
8/16/2023	Marqui Hood	Review/ Analyze	1.2	Tracking down origin of discovery request/court orders that resulted in the production of the newly produced evidence (Vaughn) re nword graffiti during Diaz's employment period

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8/16/2023	Marqui Hood	Review/ Analyze	0.5	Researching possible conflicts in Tesla's argument re: "no centralized database re complaints" in briefing submitted in Vaughn.
8/16/2023	Marqui Hood	Communication	0.2	Call with Molly Durkin re: new evidence reply briefing
8/16/2023	Marqui Hood	Communication	0.1	Call w/ Larry Organ re: declaration re: Vaughn facts submission in Diaz
8/16/2023	Marqui Hood	Draft/ Revise	0.5	Drafting dec. re; new evidence reply
8/16/2023	Marqui Hood	Review/ Analyze	0.8	Reviewing retrial transcripts for evidentiary citation re: motion for new trial, reply brief re: new evidence
8/16/2023	Marqui Hood	Draft/ Revise	0.4	Drafting Larry Organ declaration ISO notice of new evidence
8/16/2023	Marqui Hood	Review/ Analyze	0.1	locating exhibits for reply re new evidence
8/16/2023	Marqui Hood	Draft/ Revise	0.5	Review & edits to Reply briefing re: new evidence
8/17/2023	Marqui Hood	Communication	0.1	Call w/ Molly Durkin re: reply brief ISO notice of new evidence edits
8/17/2023	Marqui Hood	Draft/ Revise	0.3	Edits to Reply brief ISO notice of new evidence & decs
8/17/2023	Marqui Hood	Draft/ Revise	0.8	Add' edits to dec & exhibits ISO notice of new evidence, pulling record info for reply brief pre Michael Rubin edits
8/17/2023	Marqui Hood	Draft/ Revise	0.5	New Evidence reply: harmonizing edits/new exh. & cites
8/17/2023	Marqui Hood	Communication	0.2	Call w/ Molly Durkin re reply edits
8/17/2023	Marqui Hood	Draft/ Revise	0.5	Pulling exhibits for Hood Dec. and checking cites
8/17/2023	Marqui Hood	Review/ Analyze	0.3	Locating new reply brief cites
8/17/2023	Marqui Hood	Draft/ Revise	0.1	Final edits to Michael Rubin dec version 4
8/17/2023	Marqui Hood	Draft/ Revise	0.2	Final edits and cite addition to Reply brief re new evid
8/17/2023	Marqui Hood	Communication	0.1	Email to team re: final versions of reply ISO notice of new evidence, download issues
8/18/2023	Marqui Hood	Communication	0.2	Call w/ Molly Durkin re: finalizing filing
8/18/2023	Marqui Hood	Draft/ Revise	0.5	Redacting reply brief ISO notice of new evidence
8/18/2023	Marqui Hood	Draft/ Revise	0.4	Finalizing redactions of Request for Leave, Hood dec & exhibits

Date	User	Activity	Time	Description
8/18/2023	Marqui Hood	Draft/ Revise	1.4	Researching requirements re: Amin Motion to Consider Whether Another Party's Material should be sealed, drafting motion, reviewing dec & order
8/18/2023	Marqui Hood	Review/ Analyze	0.1	Researching requirements re: Amin Motion to Consider Whether Another Party's Material should be sealed
10/4/2023	Marqui Hood	Communication	0.8	Strategy mtg re: motion for mistrial ruling, Michael Rubin, Bernard Alexander, Larry Organ, Cimone Nunley, Dustin Collier, Sabrina Grislis, Corrine Johnson

Date	User	Activity	Time	Description
8/7/2020	Emily Kohlheim	Communication	0.1	Email to Larry Organ regarding jury instruction research.
8/7/2020	Emily Kohlheim	Research	1.2	Conducted legal research on jury instruction issue about whether a company is someone's employer.
8/10/2020	Emily Kohlheim	Research	7.2	Conducted further legal research regarding jury instructions.
8/10/2020	Emily Kohlheim	Communication	0.1	Emailed legal research notes re: jury instructions to Larry Organ for review.
8/11/2020	Emily Kohlheim	Communication	0.1	Responded to Larry Organ email regarding jury instruction objection.
8/11/2020	Emily Kohlheim	Draft/ Revise	2.6	Drafted jury instruction objection.
8/11/2020	Emily Kohlheim	Communication	0.1	Emailed jury instruction objection draft to Larry Organ for review.
9/22/2021	Emily Kohlheim	Meet	1.6	Opening practice
9/22/2021	Emily Kohlheim	Meet	0.6	Opening practice
9/27/2021	Emily Kohlheim	Appearance/ Attend	4.5	Trial Day 1 attendance and strategy notes
9/27/2021	Emily Kohlheim	Communication	0.5	Discuss trial strategy with NA
9/27/2021	Emily Kohlheim	Draft/ Revise	0.7	Trial day 1 strategy notes
9/27/2021	Emily Kohlheim	Communication	0.1	Email to Navruz Avloni re trial day 1 notes
9/30/2021	Emily Kohlheim	Communication	0.1	Email to Navruz Avloni re closing practice
1/19/2022	Emily Kohlheim	Communication	0.3	Call with Cimone Nunley regarding the damages hearing.
1/10/2023	Emily Kohlheim	Meet	0.1	Team meeting regarding trial strategy.
2/16/2023	Emily Kohlheim	Meet	2.5	Attended focus group and debrief meeting with team.
2/17/2023	Emily Kohlheim	Communication	0.2	Contacting counsel from defamation case against Elon Musk for trial transcripts.
2/28/2023	Emily Kohlheim	Communication	0.1	Emailed and left voicemail for L. Lin Wood regarding trial transcripts from defamation case in which Alex Spiro was opposing counsel.
3/2/2023	Emily Kohlheim	Meet	3.1	Attended focus group and team debrief session.
3/3/2023	Emily Kohlheim	Meet	0.2	Review damages results from focus group survey and discuss focus group comments with Larry Organ.
3/4/2023	Emily Kohlheim	Meet	4.6	Attended focus group and debrief with team.
3/5/2023	Emily Kohlheim	Meet	3	Attended testimony practice with client and team, provided feedback.

Date	User	Activity	Time	Description
3/10/2023	Emily Kohlheim	Meet	0.3	Met with Larry Organ and Teodora Gagauz regarding trial strategy and transcript review.
3/10/2023	Emily Kohlheim	Review/ Analyze	0.4	Reviewing trial transcripts from Unsworth v. Musk.
3/13/2023	Emily Kohlheim	Meet	3.5	Attended client examination practice.
3/13/2023	Emily Kohlheim	Meet	2.1	Attended focus group and debrief with team.
3/13/2023	Emily Kohlheim	Review/ Analyze	1.5	Reviewed Unsworth v. Musk trial transcripts.
3/14/2023	Emily Kohlheim	Review/ Analyze	0.4	Reviewing trial transcripts from Unsworth v. Musk.
3/15/2023	Emily Kohlheim	Review/ Analyze	5.2	Reviewing transcripts from Unsworth and Littleton trials.
3/16/2023	Emily Kohlheim	Review/ Analyze	0.3	Reviewing Littleton v. Musk transcripts.
3/17/2023	Emily Kohlheim	Meet	0.1	Met with Larry Organ regarding findings from other Spiro trial transcripts.
3/17/2023	Emily Kohlheim	Review/ Analyze	0.6	Reviewing Littleton v. Musk transcripts and taking notes regarding strategy.
3/17/2023	Emily Kohlheim	Meet	3.5	Team meeting regarding trial strategy.
3/18/2023	Emily Kohlheim	Meet	0.9	Team meeting regarding trial strategy and focus group preparation.
3/18/2023	Emily Kohlheim	Meet	4.6	Attended focus group and took notes, attended team debrief and provided feedback.
3/19/2023	Emily Kohlheim	Meet	4.5	Attended team meeting regarding trial strategy, prepared chart of witness testimony from first trial.
3/20/2023	Emily Kohlheim	Review/ Analyze	3.4	Reviewed client testimony from first trial and created chart of testimony regarding racist conduct and emotional distress.
3/21/2023	Emily Kohlheim	Meet	2.7	Attended focus group and debrief with team.
3/22/2023	Emily Kohlheim	Communication	0.1	Call with Julianne Stanford regarding focus groups and trial strategy.
3/22/2023	Emily Kohlheim	Review/ Analyze	0.4	Reviewed email from jury coordinator and jury questionnaire with first 2 juror responses.
3/22/2023	Emily Kohlheim	Review/ Analyze	1	Reviewed deposition designations for Annalisa Heisen from first trial and for retrial, made a chart to compare and sent to Larry Organ for review.
3/23/2023	Emily Kohlheim	Communication	0.1	Call with Larry Organ regarding response to opposing counsel's email regarding deposition designations.
3/23/2023	Emily Kohlheim	Communication	0.2	Reviewed deposition designations and drafted response to opposing counsel.
3/25/2023	Emily Kohlheim	Communication	0.1	Call with Larry Organ regarding review of discovery responses regarding client's emotional distress.



Date	User	Activity	Time	Description
3/25/2023	Emily Kohlheim	Review/ Analyze	1	Reviewed discovery responses and made note of responses regarding client's emotional distress. Sent to Larry Organ for review.
3/26/2023	Emily Kohlheim	Communication	0.1	Reviewed team emails regarding expert testimony and jury selection.
3/26/2023	Emily Kohlheim	Review/ Analyze	0.3	Reviewed discovery responses regarding witnesses.
3/26/2023	Emily Kohlheim	Meet	2.1	Attended team meeting for opening statement practice, provided feedback.
3/27/2023	Emily Kohlheim	Meet	1.1	Attended team meeting regarding opening statement debrief and witness examination strategy.
4/4/2023	Emily Kohlheim	Meet	0.3	Meet with Larry Organ regarding trial.
5/3/2023	Emily Kohlheim	Communication	0.1	Reviewed team emails regarding juror misconduct.
5/3/2023	Emily Kohlheim	Communication	0.1	Communication with Marqui Hood and Cameron Hartquist regarding meeting to discuss Dr. Reading.
5/4/2023	Emily Kohlheim	Communication	0.1	Communication with Marqui Hood and Cameron Hartquist regarding meeting to discuss Dr. Reading.
5/5/2023	Emily Kohlheim	Meet	0.1	Met with Larry Organ regarding potential mistrial and retrial.
5/8/2023	Emily Kohlheim	Meet	0.6	Met with Marqui Hood and Cameron Hartquist regarding Dr. Reading.

Date	User	Activity	Time	Description
4/30/2018	Ramzi Nimr	Plan/ Prepare	0.3	Prepare Proof of Service for Plaintiffs' discovery requests to Defendant West Valley, set one; notices of deposition of Rovilla Wetle and Monica Deleon
5/1/2018	Ramzi Nimr	Draft/ Revise	0.2	Prepare the Proof of Service for Plaintiff Owen Diaz's interrogatories to Defendants Tesla and Citistaff, sets one; notice of deposition of Defendant Tesla's person most knowledgeable
5/11/2018	Ramzi Nimr	File/ Serve	1.1	Prepare proof of service, mail, and serve Plaintiff Demetric Di-az responses to Defendant Tesla's request for production of documents.
5/17/2018	Ramzi Nimr	Plan/ Prepare	0.1	Printing deposition materials for Owen Diaz
5/21/2018	Ramzi Nimr	Other	0.1	Scan/save deposition subpoena for the production of business records
6/5/2018	Ramzi Nimr	Research	1	Research joint employer.
6/5/2018	Ramzi Nimr	Plan/ Prepare	0.7	Prepare a trial subpoena for Rovila Wetle.
6/6/2018	Ramzi Nimr	Meet	0.2	
6/6/2018	Ramzi Nimr	Plan/ Prepare	1	Figuring out camcorder data saving process and saving files of deposition of Rovila Wetle.
6/7/2018	Ramzi Nimr	Appearance/ Attend	5.9	Appear for the deposition of Javier Caballero; act as videographer.
6/8/2018	Ramzi Nimr	Plan/ Prepare	0.8	Prepare for mediation and prepare documents for mediation.
6/8/2018	Ramzi Nimr	Meet	0.4	Meet with Noah Baron to discuss the client's deposition
6/11/2018	Ramzi Nimr	Appearance/ Attend	7.5	Appear at mediation, travel to and from.
6/12/2018	Ramzi Nimr	Meet	0.3	Meet with Navruz Avloni regarding documents
6/13/2018	Ramzi Nimr	Review/ Analyze	1.1	Review and summarize documents.
6/14/2018	Ramzi Nimr	Plan/ Prepare	0.7	Organize the folder and discuss document summary.
6/15/2018	Ramzi Nimr	Draft/ Revise	4.1	Draft the document summary of the Initial Disclosures.
6/18/2018	Ramzi Nimr	Review/ Analyze	0.6	Review the complaint.
6/18/2018	Ramzi Nimr	Draft/ Revise	2.6	Prepare the document summary of the initial disclosures.
6/19/2018	Ramzi Nimr	Draft/ Revise	3.4	Draft summary of initial disclosures.
6/19/2018	Ramzi Nimr	Draft/ Revise	0.6	Draft a summary of discovery responses in case.

Date	User	Activity	Time	Description
6/20/2018	Ramzi Nimr	Draft/ Revise	3.8	Draft a discovery summary
6/20/2018	Ramzi Nimr	Draft/ Revise	1	Draft a list of missing documents
6/22/2018	Ramzi Nimr	Review/ Analyze	2.8	Review document production
6/25/2018	Ramzi Nimr	Draft/ Revise	2	Draft a summary and analysis of document production.
6/25/2018	Ramzi Nimr	Review/ Analyze	2.5	Review the complaint, documents, discovery to familiarize with the case.
6/28/2018	Ramzi Nimr	Meet	0.1	Met with Navruz Avloni to discuss strategy
6/29/2018	Ramzi Nimr	Plan/ Prepare	0.7	Review and prepare materials for strategy meeting.
7/5/2018	Ramzi Nimr	Research	1.7	Research and investigate witnesses
7/5/2018	Ramzi Nimr	Research	2	Further investigate and research witnesses.
7/6/2018	Ramzi Nimr	Draft/ Revise	3.5	Draft witness chart.
7/9/2018	Ramzi Nimr	Draft/ Revise	1.5	Draft witness chart.
7/11/2018	Ramzi Nimr	Communication	0.2	Conversation with Larry Organ regarding soundbites.
7/11/2018	Ramzi Nimr	Review/ Analyze	1.2	Review documents and witness notes.
10/16/2018	Ramzi Nimr	Appearance/ Attend	6.5	Mediation
10/16/2018	Ramzi Nimr	Review/ Analyze	1	Review case materials before mediation
11/26/2018	Ramzi Nimr	Communication	0.1	Call to client regarding Ramon Martinez
11/26/2018	Ramzi Nimr	Communication	0.1	Communication with Owen Diaz regarding deposition preparation.
11/26/2018	Ramzi Nimr	Plan/ Prepare	5	Prepare for the deposition of Edward Romero.
11/27/2018	Ramzi Nimr	Review/ Analyze	4.5	Deposition preparation for Edward Romero

<b>Date</b>	<b>User</b>	<b>Activity</b>	<b>Time</b>	<b>Description</b>
4/18/2018	Cimone Nunley	Communication	0.2	Send amended notice of deposition to clients Owen Diaz and Demetric Di-az for their depositions via e-mail.
4/27/2018	Cimone Nunley	Review/ Analyze	0.9	Review initial disclosures from Defendant Tesla, Inc.
4/27/2018	Cimone Nunley	Review/ Analyze	0.8	Review and summarize initial disclosures from defendant Tesla, Inc.
4/27/2018	Cimone Nunley	Meet	0.3	Meet with Larry Organ regarding case strategy
5/2/2018	Cimone Nunley	Draft/ Revise	3.7	Draft responses to requests for production and interrogatories, Set One, from Defendant Citistaff Solutions, Inc. to Owen Diaz
5/2/2018	Cimone Nunley	Meet	0.2	Meet with Larry Organ and Navruz Avloni regarding settlement
5/3/2018	Cimone Nunley	Draft/ Revise	2.5	Draft responses to requests for production, Set One, from Defendants Citistaff Solutions, Inc. and Tesla, Inc. to Plaintiffs Owen Diaz and Demetric Di-az
5/5/2018	Cimone Nunley	Communication	0.2	Call client Owen Diaz to prepare responses to requests for production, Set One, from Defendant Tesla. Inc. and Defendant Citistaff Solutions, Inc.
5/5/2018	Cimone Nunley	Communication	0.1	Send e-mail to Navruz Avloni with questions regarding discovery responses and deposition scheduling
5/9/2018	Cimone Nunley	Draft/ Revise	4.9	Draft responses to defendant Tesla, Inc.'s requests for production, Set One, to Plaintiff Owen Diaz
5/9/2018	Cimone Nunley	Draft/ Revise	0.3	Draft responses to Defendant Citistaff Solutions, Inc.'s requests for production, Set One, to Plaintiff Owen Diaz
5/11/2018	Cimone Nunley	Draft/ Revise	1.9	Draft responses to Citistaff's request for production of documents to Owen Diaz
5/11/2018	Cimone Nunley	Draft/ Revise	2.1	Edit client Owen Diaz's responses to Tesla request for production of documents.
5/11/2018	Cimone Nunley	Draft/ Revise	0.6	Continue editing Owen Diaz's discovery responses to Citistaff's request for production of documents
5/12/2018	Cimone Nunley	Draft/ Revise	1.9	Revise Plaintiff Owen Diaz's responses to Defendant Tesla's request for production of documents

<b>Date</b>	<b>User</b>	<b>Activity</b>	<b>Time</b>	<b>Description</b>
5/18/2018	Cimone Nunley	Communication	0.1	phone call with client to discuss additional docs for Tesla and Citistaff's RPDs- resumes and insurance info
6/6/2018	Cimone Nunley	Review/ Analyze	0.2	Briefly review Defendants Citistaff and Tesla's responses to requests for production of documents and interrogatories.
6/8/2018	Cimone Nunley	Communication	0.5	Meet with Larry Organ, Noah Baron, and Ramzi Nimr regarding the depositions of Javier Caballero and Victor Quintero.
6/8/2018	Cimone Nunley	Communication	0.1	Call clients to remind of Monday mediation
8/28/2018	Cimone Nunley	File/ Serve	0.3	Help Sabrina Grislis file Joint Case Management Statement on ECF.
9/5/2018	Cimone Nunley	Review/ Analyze	0.5	Review Tesla's discovery responses in preparation for meet and confer letter.
9/5/2018	Cimone Nunley	Communication	0.1	Discussion with Navruz Avloni regarding witness list and discovery requests
9/6/2018	Cimone Nunley	Review/ Analyze	1.7	Review Javier Caballero deposition to evaluate potential supplemental discovery requests.
9/6/2018	Cimone Nunley	Review/ Analyze	1.4	Review Victor Quintero deposition for information regarding potential additional discovery requests.
9/6/2018	Cimone Nunley	Review/ Analyze	1.3	Review file, create list of potential deponents
9/6/2018	Cimone Nunley	Review/ Analyze	0.7	Review Tesla, Citistaff, and West Valley's discovery responses, begin drafting meet and confer letter regarding outstanding discovery issues
9/7/2018	Cimone Nunley	Meet	0.2	Meet with Navruz Avloni regarding depositions to take in case.
9/7/2018	Cimone Nunley	Review/ Analyze	0.7	Review Rovila Wetle deposition for names of additional potential deponents
9/7/2018	Cimone Nunley	Meet	0.3	Meet with Navruz Avloni and Larry Organ to review list of individuals to depose
9/7/2018	Cimone Nunley	Review/ Analyze	0.2	Review Owen Diaz deposition transcript for names of coworkers.
9/7/2018	Cimone Nunley	Review/ Analyze	0.3	Review discovery responses from Tesla, Citistaff, and West Valley to identify issues for meet and confer.

<b>Date</b>	<b>User</b>	<b>Activity</b>	<b>Time</b>	<b>Description</b>
9/10/2018	Cimone Nunley	Research	0.3	Save and label research into video deposition objections
9/10/2018	Cimone Nunley	Review/ Analyze	0.7	Review discovery responses from Tesla, Citistaff, and West Valley for meet and confer letter
9/10/2018	Cimone Nunley	Draft/ Revise	1.2	Draft additional special interrogatories to Defendant Tesla from Plaintiff Owen Diaz
9/10/2018	Cimone Nunley	Draft/ Revise	0.4	Draft supplemental requests for production of documents to Defendant Tesla
9/11/2018	Cimone Nunley	Draft/ Revise	0.2	Revise interrogatories to Defendant Tesla per conversation with Noah Baron regarding different messaging applications.
9/11/2018	Cimone Nunley	Draft/ Revise	0.9	Draft the person most knowledgeable deposition notice for Defendant West Valley.
9/12/2018	Cimone Nunley	Draft/ Revise	0.5	Draft the person most knowledgeable deposition notice for Defendant Citistaff.
9/12/2018	Cimone Nunley	Draft/ Revise	0.5	Prepare deposition notice and subpoena for Wayne Jackson.
9/19/2018	Cimone Nunley	Communication	0.1	Phone conversation with client Owen Diaz regarding potential 10/16 mediation date
9/19/2018	Cimone Nunley	Communication	0.1	Email to client Owen Diaz with date for mediation.
10/16/2018	Cimone Nunley	Research	0.5	Research applicability of section 1981 to failure to prevent claims
10/16/2018	Cimone Nunley	Communication	0.1	Phone call with Navruz Avloni regarding failure to prevent and section 1981 claims.
10/18/2018	Cimone Nunley	Research	0.5	Research recent jury verdicts for Section 1981 claims
10/23/2018	Cimone Nunley	Research	1	Research whether current employer information is discoverable.
10/25/2018	Cimone Nunley	Communication	0.3	Draft meet and confer letter regarding subpoenas to clients' current employers
10/30/2018	Cimone Nunley	Research	0.3	Research regarding relevance issue
11/9/2018	Cimone Nunley	Plan/ Prepare	0.3	Prepare documents for Larry Organ's 2 PM phone call with opposing counsel regarding deposition scheduling
11/9/2018	Cimone Nunley	Communication	0.3	Prepare Larry Organ for our 2:00 call with opposing counsel regarding deposition scheduling

<b>Date</b>	<b>User</b>	<b>Activity</b>	<b>Time</b>	<b>Description</b>
11/9/2018	Cimone Nunley	Communication	0.7	Phone call with opposing counsel and Larry Organ regarding deposition scheduling.
11/9/2018	Cimone Nunley	Draft/ Revise	0.9	Prepare deposition notices for service, prepare cover letter to accompany notices, email opposing counsel cover letter and notices.
11/15/2018	Cimone Nunley	Research	0.3	Research whether employees must be subpoenaed in federal court for deposition
11/15/2018	Cimone Nunley	Communication	0.1	Review emails regarding deposition scheduling
11/20/2018	Cimone Nunley	Communication	0.2	Phone call to client Demetric Di-az to confirm availability for deposition.
11/20/2018	Cimone Nunley	Review/ Analyze	0.1	Review the discovery dispute letter regarding Defendant's subpoenas to plaintiffs' employers
11/21/2018	Cimone Nunley	Communication	0.2	Phone call with AC Transit regarding Defendant's subpoena; advised them that the dispute is not yet resolved.
11/21/2018	Cimone Nunley	Communication	0.3	Draft email to opposing counsel requesting we consolidate dispute over new Defendant Tesla's new subpoenas to Plaintiffs' employers with the ongoing dispute regarding subpoenas to Plaintiffs' employers.
11/21/2018	Cimone Nunley	Review/ Analyze	0.2	Review discovery requests to confirm we have already requested all needed information.
11/21/2018	Cimone Nunley	Communication	0.2	Meet with Larry Organ regarding additional discovery requests
11/26/2018	Cimone Nunley	Research	0.4	Attempt to locate Edward Romero on social media
11/26/2018	Cimone Nunley	Communication	0.1	Discuss clients' deposition preparation with Larry Organ
11/26/2018	Cimone Nunley	Communication	0.2	Phone call to client Owen Diaz to confirm that he can make deposition preparation meeting tomorrow
11/26/2018	Cimone Nunley	Review/ Analyze	3.8	Review clients' deposition transcripts in preparation for tomorrow's deposition preparation meeting
11/26/2018	Cimone Nunley	Review/ Analyze	1.2	Review the topics covered in clients' depositions.
11/27/2018	Cimone Nunley	Plan/ Prepare	0.6	Review client's depositions to prepare for 11/27 meeting

<b>Date</b>	<b>User</b>	<b>Activity</b>	<b>Time</b>	<b>Description</b>
11/27/2018	Cimone Nunley	Meet	1.8	Meet with clients to prepare for their depositions
11/27/2018	Cimone Nunley	Communication	0.1	Send records request to Wheels of Justice for records subpoenaed from clients' employers
11/27/2018	Cimone Nunley	Communication	0.4	Call Wheels of Justice to order records from Home Depot
11/27/2018	Cimone Nunley	Review/ Analyze	0.1	Review records from Alamillo Rebar, Glazier Steel, and AC Transit
11/28/2018	Cimone Nunley	Communication	0.2	Discuss additional discovery requests with Larry Organ
11/28/2018	Cimone Nunley	Review/ Analyze	1.6	Review document production to ensure updated discovery requests are not duplicative and to evaluate need for meet and confer letter
11/28/2018	Cimone Nunley	Draft/ Revise	2.1	Propound additional discovery requests to all defendants
11/29/2018	Cimone Nunley	Communication	0.2	Leave voicemail with Tom Kawasaki and send follow up email
11/29/2018	Cimone Nunley	Communication	0.4	Phone conversation with Larry Organ regarding discovery
11/29/2018	Cimone Nunley	Communication	0.3	Phone call with Tom Kawasaki regarding declaration
11/29/2018	Cimone Nunley	Communication	0.1	Email to investigator Stu Kohler regarding Ramon Martinez information
11/29/2018	Cimone Nunley	Plan/ Prepare	0.2	Transcribe conversation with Tom Kawasaki for Larry Organ
11/29/2018	Cimone Nunley	Communication	0.2	Telephone call with Larry Organ regarding witness Tom Kawasaki, depositions
11/30/2018	Cimone Nunley	Communication	0.2	Phone call with clients Owen Diaz and Demetric Di-az to discuss subpoenaed documents
11/30/2018	Cimone Nunley	Communication	0.1	Discuss with Larry Organ whether we represent La'Drea Jones and Demetrica Diaz in their emotional distress witness depositions.
11/30/2018	Cimone Nunley	Draft/ Revise	1.2	Draft subpoena to nextSource
11/30/2018	Cimone Nunley	Plan/ Prepare	2	Pull exhibits and begin outline for the deposition of Monica Deleon
12/4/2018	Cimone Nunley	Communication	1	prepare and serve jackson depo subpoena



Date	User	Activity	Time	Description
12/4/2018	Cimone Nunley	Plan/ Prepare	3.1	prepare outline and sort documents for deleon depo
12/4/2018	Cimone Nunley	Meet	1.8	Meet with Navruz Avloni and Larry Organ to discuss case strategy
12/5/2018	Cimone Nunley	Communication	0.5	speak with demetrica and la'drea re scheduling of their depositions, check availability, email them depo notices
12/5/2018	Cimone Nunley	Meet	1.5	discuss strategy with Navruz Avloni, Navruz Avloni and Larry Organ
12/5/2018	Cimone Nunley	Draft/ Revise	2.7	draft de leon depo outline
12/5/2018	Cimone Nunley	Meet	0.5	Further case strategy meeting with Navruz Avloni and Larry Organ
12/10/2018	Cimone Nunley	Meet	0.6	meet w/Larry Organ, Noah Baron, and Navruz Avloni to discuss potentially adding defendant
12/10/2018	Cimone Nunley	Communication	0.2	Discuss West Valley PMK depo with Noah Baron
12/10/2018	Cimone Nunley	Draft/ Revise	1	draft responses to Tesla and Citistaff RPDs, set 2, to Owen and Demetric; provide to Navruz Avloni for review; incorporate Navruz Avloni feedback
12/10/2018	Cimone Nunley	Draft/ Revise	1.4	draft meet and confer letter re Tesla's responses to discovery requests
12/17/2018	Cimone Nunley	Other	0.2	review wheels of justice invoice to ensure paid and recorded in mycase
12/17/2018	Cimone Nunley	Draft/ Revise	4	research and draft meet and confer letters to Tesla, WV, Citistaff
12/18/2018	Cimone Nunley	Communication	0.2	draft email to opposing counsel taking tomorrow's deposition off calendar
12/18/2018	Cimone Nunley	Communication	0.2	speak with La'Drea and Demetrica- get their availability for depositions
12/19/2018	Cimone Nunley	Draft/ Revise	1.2	draft responses to tesla/citistaff ROGs
12/20/2018	Cimone Nunley	Communication	0.3	discuss courtesy copy requirements with Sabrina Grislis
12/20/2018	Cimone Nunley	Draft/ Revise	1	call clients and get answers to Tesla/Citistaff ROGs, answer Tesla/Citistaff ROGs
12/20/2018	Cimone Nunley	Communication	0.1	Discuss case with Navruz Avloni
12/21/2018	Cimone Nunley	Communication	0.3	phone call with Owen to discuss additional details for SPROG responses

Date	User	Activity	Time	Description
12/24/2018	Cimone Nunley	Draft/ Revise	3.2	prepare responses to Tesla/Citistaff ROGs to Owen- Set Two
1/2/2019	Cimone Nunley	Meet	0.2	Meet with Noah Baron to discuss discovery
1/9/2019	Cimone Nunley	Communication	0.2	discuss demetric arrest w/Larry Organ and NB
1/9/2019	Cimone Nunley	Research	1.4	research meaning of "unavailability" under FRE 804 to see if Demetric's incarceration constitutes unavailability
1/18/2019	Cimone Nunley	Other	0.2	confirm all deadlines are calendared correctly
1/22/2019	Cimone Nunley	Meet	0.1	team meeting
2/7/2019	Cimone Nunley	Communication	0.1	discuss potential settlement of case (+lambert +patterson) w/Larry Organ and NA
2/12/2019	Cimone Nunley	Draft/ Revise	3.8	draft m&c to tesla regarding their discovery responses to date
2/12/2019	Cimone Nunley	Communication	0.1	Discussion with Navruz Avloni regarding meet and confer letter to Tesla
2/13/2019	Cimone Nunley	Plan/ Prepare	0.1	calendar d/l for Tesla to respond to RPD- set 4 and ROG- set 2 (to be served by Sabrina Grislis on 2/19)
2/13/2019	Cimone Nunley	Draft/ Revise	1.3	edit meet and confer to West Valley; tesla
2/15/2019	Cimone Nunley	Research	0.7	review recent Ninth Circuit Â§1981 decision
2/20/2019	Cimone Nunley	Draft/ Revise	3.7	draft meet and confer to tesla re discovery responses
2/20/2019	Cimone Nunley	Communication	0.1	Discussion with Navruz Avloni regarding the relationship between Citistaff and Tesla
2/20/2019	Cimone Nunley	Communication	0.1	Discussed discovery with Navruz Avloni
2/21/2019	Cimone Nunley	Draft/ Revise	5.4	draft meet and confer letter to Tesla
2/25/2019	Cimone Nunley	Draft/ Revise	1	revise m&c to tesla
3/1/2019	Cimone Nunley	Draft/ Revise	0.3	edit meet and confer letter to Tesla re their discovery responses
3/1/2019	Cimone Nunley	Communication	0.1	review email from Helene Simouvlakis (West Valley counsel) confirming 2/28 phone convo and save to DB

<b>Date</b>	<b>User</b>	<b>Activity</b>	<b>Time</b>	<b>Description</b>
3/2/2019	Cimone Nunley	Plan/ Prepare	0.1	review calendar, ensure all deadlines calendared
3/7/2019	Cimone Nunley	Communication	0.3	discuss discovery plan, depositions with Navruz Avlonivruz Avloni
3/8/2019	Cimone Nunley	Draft/ Revise	3.3	review Vaughn declarations for additional witnesses and amend initial disclosures with additional witnesses
3/11/2019	Cimone Nunley	Draft/ Revise	0.3	Update initial disclosures. Email to Sabrina Grislis for service.
3/11/2019	Cimone Nunley	Draft/ Revise	0.6	draft site inspection demand
3/12/2019	Cimone Nunley	Draft/ Revise	0.2	draft cover letter to accompany deposition notices to OC
3/12/2019	Cimone Nunley	Draft/ Revise	2.6	depo notices and subpoenas to Wayne Jackson and Citistaff PMK
3/13/2019	Cimone Nunley	Draft/ Revise	1.5	draft deposition notices
3/13/2019	Cimone Nunley	Communication	0.1	discuss additional discovery with Larry Organ
3/13/2019	Cimone Nunley	Meet	0.3	discuss discovery, depo notices with Navruz Avloni
3/14/2019	Cimone Nunley	Draft/ Revise	0.3	edit meet and confer letter re depositions per Navruz Avloni feedback
3/14/2019	Cimone Nunley	Draft/ Revise	0.1	amend nextsource PMK notice per Navruz Avloni feedback
3/14/2019	Cimone Nunley	Draft/ Revise	0.1	amend tesla pmk depo notice per Navruz Avloni feedback
3/14/2019	Cimone Nunley	Draft/ Revise	0.1	amend west valley PMK depo notice per Navruz Avloni Feedback
3/14/2019	Cimone Nunley	Communication	0.2	draft email to Jean Ger containing depo notices for service
3/15/2019	Cimone Nunley	Review/ Analyze	0.3	review discovery responses from Tesla
3/15/2019	Cimone Nunley	Draft/ Revise	0.2	update witness list
3/15/2019	Cimone Nunley	Communication	0.2	reply to OC email with alternative dates for West Valley PMK depo
3/18/2019	Cimone Nunley	Communication	0.1	email to OC re depo scheduling
3/18/2019	Cimone Nunley	Communication	0.2	discuss depo scheduling with Navruz Avloni- email to OC re depo scheduling

<b>Date</b>	<b>User</b>	<b>Activity</b>	<b>Time</b>	<b>Description</b>
3/19/2019	Cimone Nunley	Communication	0.1	email to Tesla counsel- when can we expect response to M&C? calendar new d/l for next week
3/19/2019	Cimone Nunley	Communication	0.1	send previously drafted site inspection request to Navruz Avloni for review
3/19/2019	Cimone Nunley	Communication	0.1	reply to Tesla counsel email confirming response to our M&C by nd of week
3/22/2019	Cimone Nunley	Communication	0.1	email to tesla counsel- when will we receive response to feb m&c letter?
3/22/2019	Cimone Nunley	Draft/ Revise	0.3	amend Tesla and West Valley PMK notices; send f/u email to counsel for Citistaff and NextSource re availability
3/22/2019	Cimone Nunley	Communication	0.1	email copies of tesla and West Valley PMK notices to OC
3/25/2019	Cimone Nunley	Other	0.3	update active client list/to-do list
3/26/2019	Cimone Nunley	Communication	0.1	send site inspection demand for service to Sabrina Grislis
3/26/2019	Cimone Nunley	Communication	0.1	Discuss site inspection demand with Navruz Avloni
3/26/2019	Cimone Nunley	Communication	0.1	Discuss initial disclosures and depositions with Navruz Avloni
3/26/2019	Cimone Nunley	Communication	0.1	Discuss MSJ with Navruz Avloni
3/27/2019	Cimone Nunley	Draft/ Revise	0.5	meet and confer to citistaff
3/27/2019	Cimone Nunley	Meet	0.1	team meeting
3/27/2019	Cimone Nunley	Other	0.1	pull scheduling order from file and send to Sabrina Grislis to recalendar deadlines
3/29/2019	Cimone Nunley	Meet	1	meet with Navruz Avloni and Larry Organ to discuss discovery
3/29/2019	Cimone Nunley	Plan/ Prepare	0.9	review discovery to prep for mtg with Navruz Avloni and Larry Organ
3/29/2019	Cimone Nunley	Draft/ Revise	1.5	meet and confer to tesla- reply to 3/28 ltr
4/1/2019	Cimone Nunley	Review/ Analyze	0.1	review today's mail received in case
4/2/2019	Cimone Nunley	Draft/ Revise	0.3	revise depo notice for Citistaff PMK

Date	User	Activity	Time	Description
4/2/2019	Cimone Nunley	Communication	0.1	send citistaff PMK to Sabrina Grislis for service
4/2/2019	Cimone Nunley	Communication	0.1	Discuss discovery priorities with Navruz Avloni
4/3/2019	Cimone Nunley	Communication	0.1	email to Navruz Avloni and Larry Organ re depositions
4/3/2019	Cimone Nunley	Review/ Analyze	1.3	review previously propounded discovery to ensure no duplicative requests being sent
4/3/2019	Cimone Nunley	Communication	0.2	phone call w/witness michael wheeler to get depo availability
4/3/2019	Cimone Nunley	Communication	0.2	t/c to witness Tom Kawasaki for his depo availability
4/3/2019	Cimone Nunley	Communication	0.1	text with Navruz Avloni re M&C letters
4/3/2019	Cimone Nunley	Draft/ Revise	0.7	draft depo notices to wheeler, kawasaki, timbreza
4/3/2019	Cimone Nunley	Draft/ Revise	1.7	propound additional discovery to Tesla
4/3/2019	Cimone Nunley	Review/ Analyze	1.2	review and summarize discovery for M&C letter to Tesla
4/5/2019	Cimone Nunley	Review/ Analyze	0.7	review discovery to prepare for drafting meet and confer letter to Tesla
4/5/2019	Cimone Nunley	Review/ Analyze	0.1	review nextsource initial disclosures
4/9/2019	Cimone Nunley	Communication	0.1	review response to M&C letter from Tesla counsel
4/10/2019	Cimone Nunley	Draft/ Revise	1	draft response to tesla M&C
4/11/2019	Cimone Nunley	Plan/ Prepare	0.5	prepare Kawasaki and Wheeler depo notices
4/11/2019	Cimone Nunley	Review/ Analyze	0.2	review FRCP re issuing subpoenas
4/15/2019	Cimone Nunley	Communication	0.1	leave voicemail for wheeler- address for service of process
4/15/2019	Cimone Nunley	Communication	0.2	email to Kawasaki w/notice and request for address
4/15/2019	Cimone Nunley	Review/ Analyze	1.3	review & summarize Tesla RPD responses- sets 3&4
4/15/2019	Cimone Nunley	Draft/ Revise	0.5	draft second response to tesla meet and confer

<b>Date</b>	<b>User</b>	<b>Activity</b>	<b>Time</b>	<b>Description</b>
4/15/2019	Cimone Nunley	Draft/ Revise	1	finish drafting M&C letter to Tesla re their prior letters
4/17/2019	Cimone Nunley	Meet	0.1	Team meeting
4/17/2019	Cimone Nunley	Plan/ Prepare	0.3	review discovery propounded- prepare list for meeting
4/17/2019	Cimone Nunley	Review/ Analyze	0.1	review West Valley objections to PMK notice
4/17/2019	Cimone Nunley	Draft/ Revise	2.1	draft meet and confer
4/18/2019	Cimone Nunley	Research	0.5	review protective order standard
4/18/2019	Cimone Nunley	Review/ Analyze	2.9	review additional discovery responses from Tesla
4/18/2019	Cimone Nunley	Draft/ Revise	1.2	finish drafting response to Tesla's 4/8 meet and confer letter
4/18/2019	Cimone Nunley	Communication	0.1	leave voicemail with Michael Wheeler re depo scheduling
4/18/2019	Cimone Nunley	Communication	0.1	leave voicemail for Kawasaki re depo scheduling
4/19/2019	Cimone Nunley	Communication	0.1	Telephone conference with Kawasaki to confirm availability on 5/20 for depo
4/19/2019	Cimone Nunley	Review/ Analyze	0.2	review Wheeler/Kawasaki Notices with Navruz Avloni
4/19/2019	Cimone Nunley	Draft/ Revise	0.8	revise kawasaki/wheeler notices, research service requirements, prep service stipulations
4/19/2019	Cimone Nunley	Research	0.5	research depo limit wrt multiple PMKs
4/19/2019	Cimone Nunley	Draft/ Revise	0.2	update witness scheduling sheet
4/24/2019	Cimone Nunley	Plan/ Prepare	0.1	consolidate list of addtl discovery to propound on nextSource and Tesla for mtg with Navruz Avloni
4/24/2019	Cimone Nunley	Draft/ Revise	2.9	propound additional discovery to Tesla/NS -- review with Navruz Avloni -- edit additional discovery -- prepare POS -- personally serve on OC
4/24/2019	Cimone Nunley	Other	0.1	calendar d/l for discovery propounded
4/24/2019	Cimone Nunley	Review/ Analyze	0.3	review tesla's supplemental discovery responses

Date	User	Activity	Time	Description
4/25/2019	Cimone Nunley	Other	0.3	update ACL, discuss depo scheduling with Navruz Avloni
4/25/2019	Cimone Nunley	Communication	0.1	convo with Navruz Avloni about upcoming tasks; meet and confer efforts
4/25/2019	Cimone Nunley	Draft/ Revise	0.3	amend depo notices to NS PMK and Wayne Jackson
4/26/2019	Cimone Nunley	Draft/ Revise	4.1	letter to Tesla re addtl discovery responses
4/26/2019	Cimone Nunley	Communication	0.1	Discussed the depositions of Michael Wheeler and Tamotsu Kawasaki with Navruz Avloni
4/29/2019	Cimone Nunley	Draft/ Revise	2.9	draft m&c to tesla
4/30/2019	Cimone Nunley	Meet	0.1	team meeting
4/30/2019	Cimone Nunley	Draft/ Revise	3.3	meet and confer to tesla
5/1/2019	Cimone Nunley	Draft/ Revise	0.1	meet and confer to tesla
5/1/2019	Cimone Nunley	Draft/ Revise	0.3	draft meet and confer to tesla
5/1/2019	Cimone Nunley	Draft/ Revise	1.2	meet and confer to tesla
5/2/2019	Cimone Nunley	Review/ Analyze	0.1	review NS initial disclosures- email to NA
5/2/2019	Cimone Nunley	Review/ Analyze	1.6	review and summarize outstanding meet and confer issues with respect to all defendants.
5/5/2019	Cimone Nunley	Plan/ Prepare	0.6	prepare docs and request summary of discovery sent to all deefendants for Navruz Avloni meeting with all OC on 5/9
5/7/2019	Cimone Nunley	Communication	0.9	call la'drea - call demetrica - send out emails re depo scheduling
5/10/2019	Cimone Nunley	Communication	0.2	t/c to client re depo availability
5/10/2019	Cimone Nunley	Other	0.1	upload titus depo notice to DB
5/16/2019	Cimone Nunley	Plan/ Prepare	2	pull exhibits for jackson depo
5/17/2019	Cimone Nunley	Draft/ Revise	0.4	draft RPD set 6 to Tesla for personal service today
5/20/2019	Cimone Nunley	Communication	0.1	t/c with Navruz Avloni re demetrica and la'drea depo prep

Date	User	Activity	Time	Description
5/20/2019	Cimone Nunley	Plan/ Prepare	0.5	prep brief timeline for Navruz Avloni for demetrica/ladrea depo prep meetings
5/20/2019	Cimone Nunley	Review/ Analyze	0.1	review completed subpoena acknowledgement from Kawasaki
5/21/2019	Cimone Nunley	Communication	0.3	t/c with Navruz Avloni re discovery
5/22/2019	Cimone Nunley	Research	1.1	research and start drafting stip re depositions
5/22/2019	Cimone Nunley	Communication	0.2	Discussed discovery with Navruz Avloni
5/24/2019	Cimone Nunley	Draft/ Revise	0.5	draft discovery requests to tesla, nextsource, citistaff
5/24/2019	Cimone Nunley	Draft/ Revise	0.5	update Martinez and Timbreza depo notices
6/6/2019	Cimone Nunley	Communication	0.2	discuss responses to discovery propounded by tesla with Sabrina Grislis
6/6/2019	Cimone Nunley	Communication	1.4	review discovery requests from Tesla to clients- summarize and send to clients w/request for f/u call
6/6/2019	Cimone Nunley	Communication	0.1	Telephone conference with Larry Organ re m&c to citistaff
6/7/2019	Cimone Nunley	Communication	0.1	Telephone conference with Owen re discovery responses (set up call for tomorrow)
6/7/2019	Cimone Nunley	Communication	0.5	Telephone conference with clt re discovery responses to Tesla requests
6/10/2019	Cimone Nunley	Review/ Analyze	0.2	review Larry Organ notes from Citistaff PMK depo and save to DB
6/10/2019	Cimone Nunley	Communication	0.1	email to Sabrina Grislis re discovery responses to Tesla requests
6/11/2019	Cimone Nunley	Communication	0.1	text to wheeler to confirm depo
6/11/2019	Cimone Nunley	Draft/ Revise	2.2	draft discovery responses to Tesla requests
6/12/2019	Cimone Nunley	Draft/ Revise	4.2	draft responses to Tesla discovery
6/12/2019	Cimone Nunley	Postage/Delivery	0.3	prepare discovery responses for mailing
6/12/2019	Cimone Nunley	Communication	0.2	discuss wheeler depo w/Larry Organ, NA
6/12/2019	Cimone Nunley	Communication	0.4	Discussion with Larry Organ and Navruz Avloni regarding discovery responses



<b>Date</b>	<b>User</b>	<b>Activity</b>	<b>Time</b>	<b>Description</b>
6/12/2019	Cimone Nunley	Communication	0.1	Discussed Tesla's discovery responses to RFAs and RPDs with Navruz Avloni
6/17/2019	Cimone Nunley	Communication	0.1	t/c with Navruz Avloni re owen depo prep
6/17/2019	Cimone Nunley	Review/ Analyze	6.6	review & summarize days 1 and 2 of owen depo
6/18/2019	Cimone Nunley	Review/ Analyze	1.7	finish summarizing owen depo transcript
6/18/2019	Cimone Nunley	Draft/ Revise	2.5	draft objections to owen depo notice
6/18/2019	Cimone Nunley	Plan/ Prepare	0.5	adjust deadlines and ACL based on judge orrick's approval of stip to continue trial
6/18/2019	Cimone Nunley	Review/ Analyze	0.1	review email from Navruz Avloni re demetrica depo transcripts
6/25/2019	Cimone Nunley	Draft/ Revise	7.6	draft responses to NS discovery, create POS, drop in mail
6/26/2019	Cimone Nunley	Review/ Analyze	0.5	review wheeler depo
6/28/2019	Cimone Nunley	Review/ Analyze	0.5	review wheeler depo
7/3/2019	Cimone Nunley	Draft/ Revise	1.8	review docs- create witness list
7/5/2019	Cimone Nunley	Review/ Analyze	2.7	review/summarize docs in file; compile witness list
7/8/2019	Cimone Nunley	Review/ Analyze	5.4	review and summarize key docs to ensure all necessary witnesses are deposited
7/10/2019	Cimone Nunley	Communication	0.2	discuss discovery with Navruz Avloni
7/10/2019	Cimone Nunley	Draft/ Revise	1.3	draft subpoena, notice of subpoena, attachment for subpoena to our office re lambert docs
7/10/2019	Cimone Nunley	Postage/Delivery	0.5	print and mail subpoena for lambert docs
7/11/2019	Cimone Nunley	Review/ Analyze	0.1	review CNR from Action Health Center and upload to DB
7/11/2019	Cimone Nunley	Review/ Analyze	2.6	review WV000001-586 for witness names
7/11/2019	Cimone Nunley	Communication	0.1	t/c to Larry Organ for clarification on subpoena issue
7/11/2019	Cimone Nunley	Draft/ Revise	0.9	compile witness list

<b>Date</b>	<b>User</b>	<b>Activity</b>	<b>Time</b>	<b>Description</b>
7/12/2019	Cimone Nunley	Plan/ Prepare	1.2	prepare witness list
7/15/2019	Cimone Nunley	Review/ Analyze	2.9	complete doc review/witness list
7/16/2019	Cimone Nunley	Plan/ Prepare	0.7	prepare witness list in advance of meeting with Navruz Avloni and LO
7/16/2019	Cimone Nunley	Meet	1.5	meet w/Larry Organ and Navruz Avloni re witness list
7/16/2019	Cimone Nunley	Plan/ Prepare	1.2	create updated witness chart
7/18/2019	Cimone Nunley	Draft/ Revise	1.9	create updated witness/to do list
7/18/2019	Cimone Nunley	Draft/ Revise	0.9	draft stip re addtl depositions
7/18/2019	Cimone Nunley	Communication	0.1	text message to Owen Diaz to set up call
7/18/2019	Cimone Nunley	Communication	0.1	Telephone conference with Owen Diaz
7/18/2019	Cimone Nunley	Research	1.1	research standards for objections for 30(b)(6) depositions
7/18/2019	Cimone Nunley	Communication	0.2	Telephone conference with Owen re Timbreza; "Robert"
7/19/2019	Cimone Nunley	Draft/ Revise	1.2	draft stip to increase number of depositions
7/19/2019	Cimone Nunley	Draft/ Revise	4.2	draft meet and confer to nextsource re discovery
7/22/2019	Cimone Nunley	Communication	0.6	discuss subpoenas with Navruz Avloni- send updated copies to Sabrina Grislis with instructions for service
7/22/2019	Cimone Nunley	Communication	0.1	email to Navruz Avloni, Sabrina Grislis re subpoena to our office
7/23/2019	Cimone Nunley	Draft/ Revise	0.4	revise stip re additional depositions per Navruz Avloni edits
7/23/2019	Cimone Nunley	Draft/ Revise	0.6	s/w Larry Organ about changes to stip- discuss with Navruz Avloni- make changes to stip
7/23/2019	Cimone Nunley	Communication	0.2	email to parties enclosing stip for increasing # of depositions
7/23/2019	Cimone Nunley	Meet	0.5	phone mtg with Navruz Avloni, Larry Organ, Bernard Alexander

Date	User	Activity	Time	Description
7/23/2019	Cimone Nunley	Draft/ Revise	1.1	draft meet and confer to NS
7/23/2019	Cimone Nunley	Communication	0.1	Follow up discussion with Larry Organ and Navruz Avloni after meeting with Bernard Alexander
7/24/2019	Cimone Nunley	Review/ Analyze	1.4	review key docs- compile summary- send docs and depo to bernard
7/25/2019	Cimone Nunley	Communication	0.3	discuss patterson depo with Navruz Avloni
7/25/2019	Cimone Nunley	Communication	0.1	discuss summarizing depositions with Sabrina Grislis
8/5/2019	Cimone Nunley	Communication	0.2	review joint letter brief from Tesla OC re subpoena of lambert docs; reply to Navruz Avloni email
8/5/2019	Cimone Nunley	Meet	0.2	meet with Navruz Avloni to discuss response to tesla meet and confer
8/5/2019	Cimone Nunley	Meet	0.5	meet with Navruz Avloni, Noah Baron, Larry Organ and discuss "customer" issue
8/5/2019	Cimone Nunley	Research	0.5	research unruh customer issue
8/5/2019	Cimone Nunley	Draft/ Revise	2.2	draft response to tesla's meet and confer letter
8/5/2019	Cimone Nunley	Communication	0.1	discuss with Navruz Avloni and Larry Organ-Bernard Alexander-proposed discovery additions
8/6/2019	Cimone Nunley	Communication	0.3	t/c with Navruz Avloni re joint discovery dispute statement
8/6/2019	Cimone Nunley	Communication	0.1	email to Tesla OC: we will provide our half of joint discovery statement re Lambert subpoena tomorrow
8/6/2019	Cimone Nunley	Draft/ Revise	4.6	research and outline joint discovery dispute statement re Lambert subpoena
8/7/2019	Cimone Nunley	Draft/ Revise	5.8	draft joint letter brief re Lambert subpoena
8/8/2019	Cimone Nunley	Draft/ Revise	1.4	draft reply to tesla m&c re discovery responses
8/8/2019	Cimone Nunley	Communication	0.2	discuss tesla's modified discovery dispute letter with Navruz Avloni
8/8/2019	Cimone Nunley	Draft/ Revise	0.2	tidy meet and confer letter to Tesla counsel and send to NA

Date	User	Activity	Time	Description
8/8/2019	Cimone Nunley	Draft/ Revise	0.3	create privilege log
8/8/2019	Cimone Nunley	Draft/ Revise	2	joint discovery statement re Tesla's discovery responses
8/9/2019	Cimone Nunley	Draft/ Revise	0.8	draft revision for discovery dispute letter re Tesla's discovery responses
8/12/2019	Cimone Nunley	Review/ Analyze	0.2	review filed joint discovery statement re Lambert subpoena and confirm same as version we sent to OC
8/12/2019	Cimone Nunley	Draft/ Revise	1	draft joint discovery statement re Tesla's discovery responses
8/12/2019	Cimone Nunley	Draft/ Revise	0.9	draft amended discovery responses
8/12/2019	Cimone Nunley	Draft/ Revise	0.5	create privilege log
8/13/2019	Cimone Nunley	Communication	0.1	review and reply to email from client re Robert identity
8/13/2019	Cimone Nunley	Draft/ Revise	0.5	draft revised responses to tesla discovery
8/14/2019	Cimone Nunley	Draft/ Revise	0.8	prepare supplemental discovery to send to tesla
8/15/2019	Cimone Nunley	Communication	0.2	t/c from Owen re next steps now that we have located Robert
8/15/2019	Cimone Nunley	Communication	0.2	discuss addtl discovery with Navruz Avloni
8/16/2019	Cimone Nunley	Plan/ Prepare	3.3	review discovery in preparation for meeting w/Bernard Alexander
8/16/2019	Cimone Nunley	Draft/ Revise	0.8	update written discovery summary
8/16/2019	Cimone Nunley	Communication	0.6	strategy call w/ Larry Organ, Navruz Avloni, Bernard Alexander
8/16/2019	Cimone Nunley	Communication	0.2	Call with Navruz Avloni regarding tasks for next week, outstanding meet and confers, etc.
8/19/2019	Cimone Nunley	Draft/ Revise	6.8	draft joint dispute letter re Tesla discovery responses
8/20/2019	Cimone Nunley	Review/ Analyze	0.2	review orrick order re discovery dispute
8/20/2019	Cimone Nunley	Draft/ Revise	1.7	draft and revise joint letter brief for additoinal depositions
8/21/2019	Cimone Nunley	Draft/ Revise	2.8	draft discovery dispute letter re tesla's written discovery responses

Date	User	Activity	Time	Description
8/22/2019	Cimone Nunley	Draft/ Revise	2	draft joint discovery dispute letter re Tesla's discovery responses
8/22/2019	Cimone Nunley	Review/ Analyze	0.8	review tesla PMK depo to prep meet and confer letter
8/23/2019	Cimone Nunley	Draft/ Revise	5.9	draft joint discovery dispute statement re Tesla discovery responses
8/23/2019	Cimone Nunley	Review/ Analyze	1.1	review pmk depositions
8/26/2019	Cimone Nunley	Draft/ Revise	1	revise joint discovery statement re written discovery
8/26/2019	Cimone Nunley	Draft/ Revise	5.3	draft m&c to tesla re PMK topics
8/26/2019	Cimone Nunley	Research	0.3	research whether certified videographer required by federal rules
8/27/2019	Cimone Nunley	Draft/ Revise	3.4	draft m&c to tesla re PMK topics
8/28/2019	Cimone Nunley	Draft/ Revise	1	revise joint discovery dispute letter re written discovery
8/29/2019	Cimone Nunley	Draft/ Revise	2.1	revise joint dispute letter re written discovery (trying to hit page limit)
8/29/2019	Cimone Nunley	Draft/ Revise	5.1	draft meet and confer re Tesla PMK topics
8/30/2019	Cimone Nunley	Draft/ Revise	2.8	draft m&c re PMKs
9/3/2019	Cimone Nunley	Draft/ Revise	4.9	draft m&c to tesla re PMK
9/4/2019	Cimone Nunley	Draft/ Revise	3.9	draft discovery dispute letter re depositions
9/5/2019	Cimone Nunley	Draft/ Revise	3.5	meet and confer to tesla re PMK topics
9/9/2019	Cimone Nunley	Communication	0.1	discuss meet and confer efforts with NA
9/9/2019	Cimone Nunley	Communication	0.1	t/c with Navruz Avloni re PMK issues for all defendants
9/9/2019	Cimone Nunley	Communication	0.5	t/c with Navruz Avloni to prep for mtg with opposing counsel re additional depositions, PMK topics
9/9/2019	Cimone Nunley	Communication	0.2	t/c with Navruz Avloni re results of meet and confer with OC re addtl depositions, PMK topics
9/9/2019	Cimone Nunley	Draft/ Revise	1.6	joint discovery brief re written discovery

Date	User	Activity	Time	Description
9/9/2019	Cimone Nunley	Draft/ Revise	0.6	draft additional written discovery
9/9/2019	Cimone Nunley	Draft/ Revise	0.9	revise stip re additional depositions and circulate among Navruz Avloni, Bernard Alexander, Larry Organ
9/10/2019	Cimone Nunley	Plan/ Prepare	1.6	help Larry Organ plan for CMC
9/10/2019	Cimone Nunley	Appearance/ Attend	2.6	travel to CMC - attend CMC - return from CMC
9/10/2019	Cimone Nunley	Communication	0.2	discuss priorities/to do with Navruz Avloni
9/10/2019	Cimone Nunley	Communication	0.1	email to Navruz Avloni re discovery not received from tesla; citistaff
9/10/2019	Cimone Nunley	Communication	0.2	Discussion with Navruz Avloni regarding discovery
9/11/2019	Cimone Nunley	Communication	0.1	discuss additional discovery requests with Larry Organ
9/11/2019	Cimone Nunley	Communication	0.4	convo w/Larry Organ re his revisions to joint dispute statement
9/11/2019	Cimone Nunley	Draft/ Revise	5.7	revise/update joint dispute letter
9/12/2019	Cimone Nunley	Communication	0.1	email to Julianne Stanford/Sabrina Grislis re discovery shells
9/12/2019	Cimone Nunley	Draft/ Revise	2.2	draft joint dispute statement re Citistaff PMK topics
9/12/2019	Cimone Nunley	Plan/ Prepare	0.1	update ACL and update mycase task list for Teo
9/12/2019	Cimone Nunley	Communication	1.2	t/c with Navruz Avloni, Larry Organ, Bernard Alexander re strategy
9/12/2019	Cimone Nunley	Draft/ Revise	2.3	draft dispute letter re citistaff PMK
9/12/2019	Cimone Nunley	Communication	0.3	send notes to Navruz Avloni re patricia's email
9/12/2019	Cimone Nunley	Meet	0.3	Meeting with Larry Organ and Navruz Avloni regarding PMK topics
9/13/2019	Cimone Nunley	Communication	0.1	review Navruz Avloni email to OC re our discovery responses
9/13/2019	Cimone Nunley	Communication	0.1	review Larry Organ email re opening statement idea
9/13/2019	Cimone Nunley	Communication	0.1	save Larry Organ opening statement idea to DB

<b>Date</b>	<b>User</b>	<b>Activity</b>	<b>Time</b>	<b>Description</b>
9/13/2019	Cimone Nunley	Communication	0.2	t/c with Navruz Avloni re meet and confer on PMK topics
9/13/2019	Cimone Nunley	Draft/ Revise	1.5	revise joint dispute ltr re written discovery to fit 2.5 pg limit
9/13/2019	Cimone Nunley	Communication	0.1	convo with Navruz Avloni re scheduling with opposing counsel; email to OC to set up meeting
9/13/2019	Cimone Nunley	Draft/ Revise	1.9	joint dispute letter re site inspection
9/14/2019	Cimone Nunley	Draft/ Revise	0.9	draft joint dispute ltr re site inspection
9/16/2019	Cimone Nunley	Meet	0.1	Meet with team to discuss case status, trial planning and discovery
9/16/2019	Cimone Nunley	Draft/ Revise	0.3	draft dispute letter to Citistaff re pmk topics
9/17/2019	Cimone Nunley	Draft/ Revise	3.3	joint letter brief re CS PMK
9/17/2019	Cimone Nunley	Draft/ Revise	0.5	revise joint letter brief re site inspection
9/17/2019	Cimone Nunley	Communication	0.1	Discussed dispute letter with Navruz Avloni
9/19/2019	Cimone Nunley	Communication	0.1	discuss Tesla RPD issue with Navruz Avloni
9/19/2019	Cimone Nunley	Communication	0.1	discuss procedure for filing discovery dispute letter with Sabrina Grislis
9/19/2019	Cimone Nunley	Communication	0.1	Discussed discovery with Navruz Avloni and Larry Organ
9/20/2019	Cimone Nunley	Review/ Analyze	0.2	review OC's revisions to joint letter brief - remove line numbers - email Larry Organ, Navruz Avloni, BA
9/20/2019	Cimone Nunley	Draft/ Revise	2.9	draft joint letter brief re tesla pmk topics
9/20/2019	Cimone Nunley	File/ Serve	0.3	file joint letter brief re written discovery
9/20/2019	Cimone Nunley	Communication	0.1	Telephone call with Navruz Avloni regarding joint dispute letter
9/22/2019	Cimone Nunley	Draft/ Revise	2	draft joint dispute letter re tesla PMK topics
9/22/2019	Cimone Nunley	Draft/ Revise	1	m&c to ns re discovery responses

Date	User	Activity	Time	Description
9/23/2019	Cimone Nunley	Draft/ Revise	0.2	tidy up joint dispute re PMK topics and send to Navruz Avloni w/ question
9/23/2019	Cimone Nunley	Review/ Analyze	2.3	summarize depositions to prep for MSJ
9/24/2019	Cimone Nunley	Draft/ Revise	0.5	research/draft memo re 1981 legal standard
9/25/2019	Cimone Nunley	Draft/ Revise	1.1	research standards under 1981
9/26/2019	Cimone Nunley	Communication	0.2	Telephone conference with client re troy dennis
9/27/2019	Cimone Nunley	Communication	0.2	t/c with Navruz Avloni and Larry Organ re MSJ strategy
9/30/2019	Cimone Nunley	Communication	0.1	email to Tesla OC re status of response to RPD, set 7
10/3/2019	Cimone Nunley	Communication	0.6	discuss w/Larry Organ, Navruz Avloni, Bernard Alexander strategy re depositions
10/3/2019	Cimone Nunley	Draft/ Revise	0.3	cover letter re depositions
10/3/2019	Cimone Nunley	Communication	0.2	Discussion with Larry Organ and Navruz Avloni regarding strategy
10/4/2019	Cimone Nunley	Review/ Analyze	0.9	review caballero deposition
10/4/2019	Cimone Nunley	Communication	0.2	mSabrina Grislis to Sabrina Grislis re calendaring
10/4/2019	Cimone Nunley	Draft/ Revise	0.2	revise proposed order re MTC arb and send to OC
10/4/2019	Cimone Nunley	Research	0.6	research joinder issue
10/4/2019	Cimone Nunley	Communication	0.1	email to Tesla OC re meeting and conferring in person on RPD, set 7 responses; save email to DB; calendar reminder to f/u
10/4/2019	Cimone Nunley	Communication	0.1	email to patricia re m&c availability
10/4/2019	Cimone Nunley	Communication	0.1	Communication with Larry Organ and Navruz Avloni regarding expert Amy Oppenheimer
10/8/2019	Cimone Nunley	Communication	0.1	email to Bernard Alexander re meeting to discuss discovery strategy
10/8/2019	Cimone Nunley	Communication	0.1	email to Sabrina Grislis; team re Josue Torres deposition
10/8/2019	Cimone Nunley	Communication	0.4	discuss witness status with Sabrina Grislis (0.2) - email to OC with witness status (0.2)



Date	User	Activity	Time	Description
10/8/2019	Cimone Nunley	Review/ Analyze	0.1	review emails with Rob Goodstein re status of service of deposition notices
10/8/2019	Cimone Nunley	Review/ Analyze	0.1	review order granting substitution of atty; save to DB
10/8/2019	Cimone Nunley	Communication	0.2	email to Tesla counsel re meeting and conferring on discovery issues
10/8/2019	Cimone Nunley	Communication	0.1	email to Tesla counsel re meeting and conferring after thursday depo
10/8/2019	Cimone Nunley	Communication	0.3	discuss w/Larry Organ depositions
10/8/2019	Cimone Nunley	Communication	0.1	email to Tesla OC to update on Martinez service confirmation and enclosing Delgado exhibit
10/8/2019	Cimone Nunley	Communication	0.4	circulate exhibit for Delgado exhibit to OC - send to Julianne Stanford - print out for Larry Organ
10/8/2019	Cimone Nunley	Meet	1.3	meet w/Bernard Alexander, Larry Organ, Navruz Avloni re outstanding discovery disputes
10/8/2019	Cimone Nunley	Plan/ Prepare	1.9	prep for this afternoon's meeting with Navruz Avloni, Larry Organ, Bernard Alexander re discovery
10/8/2019	Cimone Nunley	Communication	0.4	discuss tesla RPDs set 7 with Larry Organ; circulate email recounting tasks assigned during 10/8 meeting
10/8/2019	Cimone Nunley	Meet	0.1	Meet with Navruz Avloni and Larry Organ regarding deposition logistics and expert reports
10/9/2019	Cimone Nunley	Communication	0.1	email to process server rob goodstein re marconi service status
10/9/2019	Cimone Nunley	Communication	0.1	email to susan kumagai forwarding bridget's info for teleconferencing in for Delgado Smith deposition
10/9/2019	Cimone Nunley	Communication	0.1	Telephone conference with Kawasaki to confirm he will attend this afternoon's depo
10/9/2019	Cimone Nunley	Communication	0.3	discuss torres depo with Larry Organ
10/9/2019	Cimone Nunley	Review/ Analyze	0.3	review josue torres docs
10/9/2019	Cimone Nunley	Communication	0.1	email to process server rob goodstein re marconi subpoena

Date	User	Activity	Time	Description
10/9/2019	Cimone Nunley	Communication	0.3	discuss depo scheduling/remote access with Navruz Avloni
10/9/2019	Cimone Nunley	Communication	0.3	call Kathy of Bridget Mattos & Associates (court reporters) re remote access for depositions
10/9/2019	Cimone Nunley	Communication	0.2	help Jean Ger w/trial subpoena stuff
10/9/2019	Cimone Nunley	Communication	0.3	email to all OC; Sabrina Grislis re remote access for depositions
10/9/2019	Cimone Nunley	Communication	0.1	email to process server Rob Goodstein re service of outstanding deposition notices
10/9/2019	Cimone Nunley	Communication	0.1	t/c to Susan Kumagai's assistant re remote access
10/9/2019	Cimone Nunley	Communication	0.1	email copy of most recent amended complaint to Charles Mahla (economics expert)
10/9/2019	Cimone Nunley	Communication	0.1	Discussed witnesses from Vaughn case; Josue Torres deposition with Navruz Avloni
10/10/2019	Cimone Nunley	Communication	0.1	discuss torres depo with Navruz Avloni
10/10/2019	Cimone Nunley	Communication	0.1	email all OC; bernard alexander re 10/14 depo being taken off calendar
10/10/2019	Cimone Nunley	Communication	0.2	Discuss expert disclosures with Navruz Avloni and Larry Organ
10/10/2019	Cimone Nunley	Communication	0.1	discuss tesla financial statements w/Sabrina Grislis
10/10/2019	Cimone Nunley	Plan/ Prepare	0.3	communicate with opposing counsel, Gus of Bernard's office about potentially moving marconi depo to 10/21
10/10/2019	Cimone Nunley	Communication	0.1	t/c with Navruz Avloni and Larry Organ re rescheduling depositions
10/11/2019	Cimone Nunley	Draft/ Revise	2.5	draft expert disclosures
10/11/2019	Cimone Nunley	Communication	0.3	email to Navruz Avloni re topics for meet and confer counsel with Tesla counsel Patricia Jeng
10/14/2019	Cimone Nunley	Communication	0.1	review proposed stip from Tesla counsel Patricia Jeng re Marconi depo
10/14/2019	Cimone Nunley	Communication	0.1	t/c with Navruz Avloni, Larry Organ re marconi depo stip
10/14/2019	Cimone Nunley	Communication	0.6	revise stip re marconi depo; email to patricia w/revise stip

Date	User	Activity	Time	Description
10/14/2019	Cimone Nunley	Communication	0.1	email to Sabrina Grislis and Gus re 10/21 marconi depo
10/14/2019	Cimone Nunley	Communication	0.1	email to Sabrina Grislis re tesla SEC filings
10/14/2019	Cimone Nunley	Communication	0.1	email to torres re speaking via phone to arrange his deposition
10/14/2019	Cimone Nunley	Draft/ Revise	2.6	revise dispute letter re site inspection
10/14/2019	Cimone Nunley	Communication	0.2	t/c to West Valley counsel to attempt to obtain signature on stip re Marconi depo
10/14/2019	Cimone Nunley	File/ Serve	0.3	file joint stip re marconi depo
10/14/2019	Cimone Nunley	Review/ Analyze	0.2	review & start outlining CS reply
10/14/2019	Cimone Nunley	Draft/ Revise	3	draft joint letter briefs re PMK topics
10/15/2019	Cimone Nunley	Communication	0.3	discuss MSJ hearing prep with Larry Organ
10/15/2019	Cimone Nunley	Communication	0.2	discuss tesla response to RPDs, set 7 with Navruz Avloni
10/15/2019	Cimone Nunley	Draft/ Revise	0.4	update dispute letter re site inspection
10/15/2019	Cimone Nunley	Draft/ Revise	0.6	revise joint dispute letters re PMK topics per Navruz Avloni feedback, send to all OC
10/15/2019	Cimone Nunley	Review/ Analyze	1	review tesla doc production
10/16/2019	Cimone Nunley	Communication	0.1	discuss tesla's most recent doc production with Navruz Avloni
10/16/2019	Cimone Nunley	Review/ Analyze	2.1	review tesla docs for additional info re potential deponents and complaints
10/16/2019	Cimone Nunley	Draft/ Revise	0.7	supplement initial disclosures
10/16/2019	Cimone Nunley	Draft/ Revise	0.8	revise initial disclosures, send to Sabrina Grislis for service
10/16/2019	Cimone Nunley	Communication	0.5	email to Tesla OC re Donet depo
10/16/2019	Cimone Nunley	Plan/ Prepare	1.4	draft questions, print exhibits, print protective order for Larry Organ for marconi depo
10/16/2019	Cimone Nunley	Plan/ Prepare	0.2	recalendar Tesla MSJ deadlines to conform with court's 10/3 order

Date	User	Activity	Time	Description
10/16/2019	Cimone Nunley	Communication	0.2	Discussed deposition of Veronica Martinez with Larry Organ and Navruz Avloni
10/17/2019	Cimone Nunley	Communication	0.1	Telephone conference with nextSource counsel Vince Adams' assistant re remote access for marconi depo; email to Gus re same
10/17/2019	Cimone Nunley	Communication	0.2	Telephone call with Navruz Avloni regarding confidential subject
10/18/2019	Cimone Nunley	Communication	0.1	email to Susan Kumagai (Citistaff counsel) re remote access for marconi depo
10/18/2019	Cimone Nunley	Draft/ Revise	2	draft tesla discovery dispute letters/discuss with Navruz Avloni
10/18/2019	Cimone Nunley	Draft/ Revise	1.5	draft tesla joint dispute letters
10/18/2019	Cimone Nunley	Communication	0.1	Call with Larry Organ regarding Tesla discovery dispute letter
10/18/2019	Cimone Nunley	Communication	0.1	Call with Navruz Avloni regarding Tesla discovery dispute letter strategy
10/21/2019	Cimone Nunley	Communication	0.1	email to Gus Ham of Bernard Alexander's office re marconi depo
10/21/2019	Cimone Nunley	Communication	0.1	text to Larry Organ re Tesla's confidential designations
10/21/2019	Cimone Nunley	Plan/ Prepare	0.5	calendar deadlines relating to 10/16 and 10/19 letters to tesla and 10/20 letter to citistaff challenging confidential designations
10/21/2019	Cimone Nunley	Communication	0.1	Telephone conference with Larry Organ re confidentiality designations and new joint employer case; letter to the court enclosing updated authority
10/21/2019	Cimone Nunley	Communication	0.1	forward new CA appeals court joint employer case to Bernard Alexander
10/21/2019	Cimone Nunley	Communication	0.1	text to Larry Organ with PMK topics on which quintero was designated
10/21/2019	Cimone Nunley	Communication	0.1	email Citistaff counsel susan kumagai re depo conference call
10/21/2019	Cimone Nunley	Communication	0.1	t/c to teo Gagauz to ask her to scan and email POS for marconi depo notice
10/21/2019	Cimone Nunley	Communication	0.1	send Larry Organ a list of me-too witnesses
10/21/2019	Cimone Nunley	Draft/ Revise	1.6	research/draft/review notice of recent decision re jimenez (joint employer decision)

Date	User	Activity	Time	Description
10/21/2019	Cimone Nunley	Communication	0.2	Telephone call with Larry Organ and Bernard Alexander regarding new case, Jimenez, to use in oral argument
10/22/2019	Cimone Nunley	Communication	0.3	discuss PMK topics and Josue Torres with Navruz Avloni
10/23/2019	Cimone Nunley	Communication	0.1	Communication with Larry Organ regarding discovery order on various discovery dispute letters
10/28/2019	Cimone Nunley	Review/ Analyze	0.1	save marconi transcripts to DB
11/1/2019	Cimone Nunley	Plan/ Prepare	0.1	calendar monday mtg w/Bernard Alexander
11/1/2019	Cimone Nunley	Other	0.2	set reminder to follow up on stip re jackson testimony on 11/4
11/4/2019	Cimone Nunley	Review/ Analyze	1.1	review tesla MSJ before convo w/Bernard Alexander
11/4/2019	Cimone Nunley	Communication	0.4	Telephone conference with BA and Larry Organ re Tesla MSJ
11/4/2019	Cimone Nunley	Communication	0.7	review CS response to 10/28 email; draft email to CS re PMK discovery dispute
11/4/2019	Cimone Nunley	Communication	0.1	Telephone conference with Larry Organ, Navruz Avloni re natasha of Bryan Schwartz Law assisting on depo summaries
11/4/2019	Cimone Nunley	Communication	0.1	email natasha of Bryan Schwartz Law a copy of protective order
11/4/2019	Cimone Nunley	Review/ Analyze	0.1	review expert depo notices
11/4/2019	Cimone Nunley	Communication	0.1	Telephone call with Larry Organ regarding confidential designations in depositions
11/5/2019	Cimone Nunley	Communication	0.3	t/c with Natasha of Bryan Schwartz Law re summarizing depositions for MSJ oppos
11/5/2019	Cimone Nunley	Communication	0.2	email to Natasha re MSJ depo summaries
11/7/2019	Cimone Nunley	Communication	0.1	email to tracey re Dr. Reading's availability for deposition
11/8/2019	Cimone Nunley	Communication	0.1	discuss proposed schedule for mtn to retain confidentiality briefing with LO
11/8/2019	Cimone Nunley	Communication	0.1	email to Reanne accepting proposed altered briefing schedule re mtn to retain confidentiality

<b>Date</b>	<b>User</b>	<b>Activity</b>	<b>Time</b>	<b>Description</b>
11/8/2019	Cimone Nunley	Other	0.3	calendar updated deadlines re mtn to retain confidentiality
11/8/2019	Cimone Nunley	Communication	0.4	draft email to OC requesting production of further documents and information per court's 10/3 order on discovery disputes; get feedback from NA; send
11/8/2019	Cimone Nunley	Communication	0.2	discuss shifting expert discovery cutoff, expert depositions, and supplemental disclosures w/Larry Organ and NA
11/8/2019	Cimone Nunley	Communication	0.1	email to Tracey re expert depo scheduling
11/8/2019	Cimone Nunley	Draft/ Revise	0.4	draft MSJ Opp- Tesla
11/11/2019	Cimone Nunley	Communication	0.1	Telephone conference with Larry Organ re expert depo objections
11/11/2019	Cimone Nunley	Communication	0.1	email to Bernard Alexander re status of expert depo scheduling
11/11/2019	Cimone Nunley	Communication	0.2	research expert disclosure local rules; email to Bernard Alexander and Navruz Avloni re deadlines
11/12/2019	Cimone Nunley	Meet	0.3	Meet with Larry Organ regarding motion for summary judgement- Tesla
11/13/2019	Cimone Nunley	Draft/ Revise	7.4	draft tesla MSJ oppo
11/13/2019	Cimone Nunley	Communication	0.2	Discussion with Larry Organ regarding the Tesla MSJ opposition
11/13/2019	Cimone Nunley	Communication	0.1	Phone call with Larry Organ regarding Tesla's discovery responses
11/14/2019	Cimone Nunley	Communication	0.3	follow-up email to Tesla counsel patricia jeng requesting production of witness info per court's order
11/14/2019	Cimone Nunley	Draft/ Revise	6.1	draft Tesla MSJ Opp
11/14/2019	Cimone Nunley	Communication	0.3	email to Tesla counsel patricia jeng re ns contract; witness info
11/14/2019	Cimone Nunley	Communication	0.3	email to Tesla counsel patricia jeng re NS contract
11/15/2019	Cimone Nunley	Meet	0.2	Meet with Larry Organ regarding oppositions to Motions for Summary Judgement
11/18/2019	Cimone Nunley	Communication	0.2	email to CS re confidential designations

Date	User	Activity	Time	Description
11/18/2019	Cimone Nunley	Draft/ Revise	2.5	draft Tesla and nextSource MSJ Opps
11/19/2019	Cimone Nunley	Draft/ Revise	10.3	tesla MSJ oppo
11/19/2019	Cimone Nunley	Communication	0.7	Meet with Larry Organ regarding the Tesla MSJ opposition brief
11/20/2019	Cimone Nunley	Communication	0.2	Telephone conference with Sabrina Grislis to provide instruction re courtesy copies of admin motion
11/20/2019	Cimone Nunley	Communication	0.1	email to Bernard Alexander re confidentiality motion
11/20/2019	Cimone Nunley	Communication	0.1	review email sent to Tesla OC with confidential documents by Sabrina Grislis to confirm all docs sent
11/21/2019	Cimone Nunley	Communication	0.2	email to Orrick's clerk w/Word version of proposed orders ISO mtn to file under seal
11/21/2019	Cimone Nunley	Communication	0.2	discuss proposed stip to designate jackson testimony w/ LO
12/2/2019	Cimone Nunley	Communication	0.1	email to Tesla counsel Patricia Jeng etc re mtn to retain confidentiality
12/2/2019	Cimone Nunley	Draft/ Revise	0.6	start drafting mtn for sanctions against Tesla
12/4/2019	Cimone Nunley	Communication	0.1	email to britt karp of Alexander Morrison & Fehr re tesla's mtn to retain confidentiality
12/4/2019	Cimone Nunley	Communication	0.1	update calendar entry re MSJ hearings; email to Bernard re new date
12/4/2019	Cimone Nunley	Communication	0.3	Telephone conference with Britt Karp re mtn to retain confidentiality
12/4/2019	Cimone Nunley	Draft/ Revise	1	draft motion for sanctions
12/5/2019	Cimone Nunley	Draft/ Revise	2.4	draft mtn for sanctions
12/6/2019	Cimone Nunley	Communication	0.3	Telephone conference with Britt Karp re mtn to retain confidentiality
12/6/2019	Cimone Nunley	Draft/ Revise	2.5	prepare admin motion to file under seal ISO plaintiff's opp motion to retain confidentiality
12/6/2019	Cimone Nunley	Draft/ Revise	5.4	draft mtn for sanctions against tesla re discovery responses
12/7/2019	Cimone Nunley	Communication	0.1	Telephone conference with Larry Organ re opp to motion to retain confidentiality



Date	User	Activity	Time	Description
12/7/2019	Cimone Nunley	Draft/ Revise	1.2	adjust mtn to retain confidentiality opp
12/7/2019	Cimone Nunley	Draft/ Revise	3.6	draft mtn for sanctions against tesla
12/8/2019	Cimone Nunley	Draft/ Revise	0.7	revise mtn to retain confidentiality oppo
12/8/2019	Cimone Nunley	Draft/ Revise	1.3	mtn for sanctions re tesla discovery
12/9/2019	Cimone Nunley	Communication	0.1	Telephone conference with Britt Karp re mtn to retain confidentiality oppo
12/9/2019	Cimone Nunley	Draft/ Revise	8.1	draft, prep exhibits, file, serve courtesy copies via email of opposition mtn to retain confidentiality
12/10/2019	Cimone Nunley	Plan/ Prepare	0.8	print/prep chambers copies of opp to motion to retain confidentiality
12/10/2019	Cimone Nunley	Postage/Delivery	0.8	finalize courtesy copies of opp to motion to retain confidentiality, take to PO
12/16/2019	Cimone Nunley	Communication	0.2	t/c and text to michael wheeler to provide updates on new trial dates.
12/16/2019	Cimone Nunley	Communication	0.4	email and letter to wheeler re new trial dates
12/16/2019	Cimone Nunley	Communication	0.1	email to bernard Alexander to see if he needs any support for MSJ hearing for all defendants
12/17/2019	Cimone Nunley	Travel Expense	3.1	travel to MSJ hearing for all defendants
12/17/2019	Cimone Nunley	Appearance/ Attend	0.9	attend MSJ hearing for all defendants
12/17/2019	Cimone Nunley	Travel Expense	1	travel from MSJ for all defendants hearing to ofc
12/19/2019	Cimone Nunley	Other	0.1	remove hearing for motion to retain confidentiality from calendar (per orrick's 12/17 comments)
12/23/2019	Cimone Nunley	Communication	0.1	convo w/Sabrina Grislis re letting wheeler know about new trial date
12/26/2019	Cimone Nunley	Draft/ Revise	1.4	draft motion for sanctions
12/27/2019	Cimone Nunley	Communication	0.3	circulate email re team meeting and updated pretrial deadlines
12/27/2019	Cimone Nunley	Communication	0.2	discuss pretrial deadlines with Navruz Avloni



<b>Date</b>	<b>User</b>	<b>Activity</b>	<b>Time</b>	<b>Description</b>
12/30/2019	Cimone Nunley	Review/ Analyze	0.6	review MSJ ruling for all defendants
12/30/2019	Cimone Nunley	Communication	0.3	discuss procedure for challenging other confidentiality designations with Sabrina Grislis
12/30/2019	Cimone Nunley	Draft/ Revise	0.6	draft settlement conference statement
12/30/2019	Cimone Nunley	Meet	0.7	Telephone meeting with Bernard Alexander and Larry Organ regarding post-MSJ work, settlement strategy
12/31/2019	Cimone Nunley	Draft/ Revise	7.4	settlement conference statement
1/2/2020	Cimone Nunley	Communication	0.2	Telephone call with Bernard Alexander re settlement
1/2/2020	Cimone Nunley	Draft/ Revise	1.4	finalize settlement conference statement (remove material to bring under page limit)
1/2/2020	Cimone Nunley	Draft/ Revise	3.5	draft motion for sanctions against Defendant Tesla, Inc.
1/2/2020	Cimone Nunley	Meet	0.6	Meet with Larry Organ, Navruz Avloni, Bernard Alexander, and Susan Organ to discuss mandatory settlement conference and strategy
1/2/2020	Cimone Nunley	Communication	0.1	Discussion with Larry Organ regarding mandatory settlement conference statement
1/3/2020	Cimone Nunley	Communication	0.4	Telephone call with Navruz Avloni, Larry Organ re sanctions motion, depositions, witnesses, trial strategy.
1/7/2020	Cimone Nunley	Communication	0.1	discuss mediation binder with Sabrina Grislis
1/9/2020	Cimone Nunley	Plan/ Prepare	0.2	add MIL idea to list
1/9/2020	Cimone Nunley	Draft/ Revise	2	draft motion for sanctions
1/10/2020	Cimone Nunley	Draft/ Revise	1.8	draft decs and revise motion for sanctions
1/13/2020	Cimone Nunley	Communication	0.1	text message to owen re current situation at work
1/13/2020	Cimone Nunley	Communication	0.4	Telephone conference with client re current situation at work
1/13/2020	Cimone Nunley	Communication	0.3	Telephone conference with Larry Organ, clients to discuss MSC

Date	User	Activity	Time	Description
1/13/2020	Cimone Nunley	Communication	0.3	discuss Owen's potential new case with Larry Organ
1/13/2020	Cimone Nunley	Draft/ Revise	0.9	finalize motion for sanctions for filing; draft dec
1/13/2020	Cimone Nunley	Communication	0.3	assist Sabrina Grislis with filing admin mtn
1/13/2020	Cimone Nunley	Communication	0.1	Discussion with Navruz Avloni regarding mandatory settlement conference
1/14/2020	Cimone Nunley	Communication	0.1	discuss service of courtesy copies with Sabrina Grislis
1/14/2020	Cimone Nunley	Communication	0.1	discuss reading invoice/depo with Larry Organ
1/14/2020	Cimone Nunley	Communication	0.1	email to Bernard Alexander re Reading invoice, deposition
1/14/2020	Cimone Nunley	Other	0.1	review chambers copies before Sabrina Grislis sends
1/14/2020	Cimone Nunley	Communication	0.2	email OC re alternative reading depo dates
1/16/2020	Cimone Nunley	Appearance/ Attend	8	attend MSC
1/17/2020	Cimone Nunley	Communication	0.1	t/c with Navruz Avloni re email to Cheryl re confidentiality
1/17/2020	Cimone Nunley	Communication	0.3	draft email to Cheryl re confidentiality
1/17/2020	Cimone Nunley	Communication	0.1	t/c with Navruz Avloni/Larry Organ re publication of plaintiff's SSN
1/17/2020	Cimone Nunley	Communication	0.1	reply to Cheryl email re publication of Plaintiff's SSN
1/17/2020	Cimone Nunley	Communication	0.1	email to the court notifying of publication of plaintiff SSN
1/17/2020	Cimone Nunley	Communication	0.1	email to Sabrina Grislis re redacting plaintiff's contact info
1/21/2020	Cimone Nunley	Draft/ Revise	1.7	draft objections to reading depo notice
1/21/2020	Cimone Nunley	Communication	0.1	email to parties re dates for expert depositions
1/22/2020	Cimone Nunley	Communication	0.2	discuss confidential designations with Larry Organ
1/22/2020	Cimone Nunley	Other	0.1	save minute order re MSC to file

Date	User	Activity	Time	Description
1/22/2020	Cimone Nunley	Communication	0.1	email to Cheryl- did the court remove non redacted doc?
1/27/2020	Cimone Nunley	Communication	0.1	Telephone conference with Owen to obtain SSN, address for settlement check
1/27/2020	Cimone Nunley	Communication	0.1	email to Cheryl w/SSN, W-9, Owen's mailing address
1/27/2020	Cimone Nunley	Communication	0.1	email to Tracey- we will check on Dr Anthony Reading's availability
1/27/2020	Cimone Nunley	Communication	0.1	gchat to Sabrina Grislis - please get Dr Anthony Reading's availability
1/27/2020	Cimone Nunley	Communication	0.1	Discussion with Navruz Avloni regarding the reply to the motion for sanctions
1/28/2020	Cimone Nunley	Communication	0.3	discuss motion for sanctions with Larry Organ
1/28/2020	Cimone Nunley	Communication	0.1	Discussion with Larry Organ regarding jury consultant
2/3/2020	Cimone Nunley	Draft/ Revise	6	draft reply to motion for sanctions
2/3/2020	Cimone Nunley	Draft/ Revise	0.6	prepare decs for motion for sanctions
2/6/2020	Cimone Nunley	Draft/ Revise	1.9	draft objections to Amy Oppenheimer depo notice
2/11/2020	Cimone Nunley	Communication	0.1	email to Tracey- dr reading no longer available 2/24, can we reset to 2/18?
2/11/2020	Cimone Nunley	Communication	0.1	email to dr reading confirming 2/18 date will work
2/11/2020	Cimone Nunley	Communication	0.1	email to Susan Haines- Amy Oppenheimer depo is off for 2/14, we'll provide additional dates
2/11/2020	Cimone Nunley	Communication	0.1	email to Amy Oppenheimer asking for additional dates for depo
2/12/2020	Cimone Nunley	Communication	0.1	email to Susan Haines from Sheppard Mullin confirming new depo date for amy oppenheimer
2/12/2020	Cimone Nunley	Communication	0.1	email to Amy Oppenheimer asking her to hold 3/2 for depo
2/13/2020	Cimone Nunley	Review/ Analyze	0.2	review court's order re unsealing MSJ opps

Date	User	Activity	Time	Description
2/13/2020	Cimone Nunley	Communication	0.1	email to Amy Oppenheimer to obtain alternate dates- Amy has a personal, family emergency and can no longer attend originally scheduled deposition
2/13/2020	Cimone Nunley	Communication	0.1	email to OC w/alternate dates for Amy Oppenheimer depo
2/13/2020	Cimone Nunley	Communication	0.1	email to Bernard Alexander re Dr Anthony Reading depo
2/13/2020	Cimone Nunley	Communication	1.1	meeting w/Larry Organ, Bernard Alexander, and Harry Plotkin to discuss case
2/13/2020	Cimone Nunley	Plan/ Prepare	0.5	print out opp/reply for motion for sanctions
2/13/2020	Cimone Nunley	Communication	0.2	discuss objections to Dr Reading's deposition notice with Larry Organ
2/14/2020	Cimone Nunley	Communication	0.1	email reading retainer agreement to jacqueline of BA's office
2/14/2020	Cimone Nunley	Draft/ Revise	0.7	draft objections to Anthony Reading depo notice
2/14/2020	Cimone Nunley	Review/ Analyze	0.2	review order denying motion for sanctions
2/14/2020	Cimone Nunley	Draft/ Revise	1.3	draft letter to tesla re confidential designations
2/17/2020	Cimone Nunley	Communication	0.1	email client to confirm receipt of corrected W-9
2/17/2020	Cimone Nunley	Communication	0.1	email OC corrected W-9
2/17/2020	Cimone Nunley	Communication	0.1	email to Charles Mahla to obtain docs for production
2/17/2020	Cimone Nunley	Communication	0.1	email to Charles Mahla requesting doc production by 2/21
2/17/2020	Cimone Nunley	Communication	0.1	email to Charles Mahla confirming docs to be produced by mid week
2/17/2020	Cimone Nunley	Draft/ Revise	0.6	draft shell and objections for charles Mahla deposition notice
2/17/2020	Cimone Nunley	Draft/ Revise	2.5	draft m&c letter to West Valley re confidential designations
2/18/2020	Cimone Nunley	Plan/ Prepare	0.4	update pretrial checklist
2/18/2020	Cimone Nunley	Draft/ Revise	1.3	draft letter to West Valley re confidential designations

<b>Date</b>	<b>User</b>	<b>Activity</b>	<b>Time</b>	<b>Description</b>
2/19/2020	Cimone Nunley	Review/ Analyze	0.1	review notice of appearance filed by tesla
2/19/2020	Cimone Nunley	Communication	0.1	email to Amy Oppenheimer enclosing updated depo notice and requesting status of the report
2/19/2020	Cimone Nunley	Meet	0.2	discuss pretrial checklist with NA
2/19/2020	Cimone Nunley	Draft/ Revise	3.1	create complete pretrial checklist from now through may
2/19/2020	Cimone Nunley	Meet	0.5	meet with Sabrina Grislis to review pretrial deadlines
2/20/2020	Cimone Nunley	Communication	0.1	discuss payment of focus group fee with Larry Organ
2/20/2020	Cimone Nunley	Communication	0.1	email to Navruz Avloni re payment of focus group fees
2/21/2020	Cimone Nunley	Draft/ Revise	0.5	prepare objections and doc production for Charles Mahla deposition
2/21/2020	Cimone Nunley	Communication	0.1	email documents and deposition objections for Charles Malha depo to Sabrina Grislis for service
2/21/2020	Cimone Nunley	Communication	0.2	discuss upcoming action items with susan
2/21/2020	Cimone Nunley	Review/ Analyze	0.1	review objections to Charles Mahla depo/doc production sent by Sabrina Grislis
2/24/2020	Cimone Nunley	Review/ Analyze	0.6	review Amy Oppenheimer amended report and email Navruz Avloni. Larry Organ, and Bernard Alexander with feedback
2/25/2020	Cimone Nunley	Communication	0.2	discuss pretrial checklist with Larry Organ
2/27/2020	Cimone Nunley	Review/ Analyze	0.2	review SO-created chart of who knew what and when
2/27/2020	Cimone Nunley	Other	0.4	figure out how to open and download .mbox files for Amy Oppenheimer docs
2/27/2020	Cimone Nunley	Communication	0.1	discuss orrick's trial calendar with Larry Organ
3/2/2020	Cimone Nunley	Plan/ Prepare	2.4	review Amy Oppenheimer doc production, mark for redaction, and forward to Sabrina Grislis to apply redactions and serve
3/2/2020	Cimone Nunley	Communication	0.1	Telephone conference with Sabrina Grislis re production of Amy Oppenheimer docs

Date	User	Activity	Time	Description
3/3/2020	Cimone Nunley	Other	0.8	mark remaining Amy Oppenheimer docs for redaction
3/3/2020	Cimone Nunley	Communication	0.3	discuss cast of characters w/SO
3/3/2020	Cimone Nunley	Communication	0.1	forward jakel williams docs to LO
3/3/2020	Cimone Nunley	Communication	0.1	email to Tracey w/availability for pretrial conference call
3/3/2020	Cimone Nunley	Communication	0.1	discuss pretrial conference call scheduling with Larry Organ
3/3/2020	Cimone Nunley	Communication	0.1	email to Bernard Alexander and Gustin Ham to set up day/time for pretrial conference call
3/3/2020	Cimone Nunley	Other	1	prepare Amy Oppenheimer docs for production
3/3/2020	Cimone Nunley	Communication	0.2	discuss w/Larry Organ whether to produce docs from fact witness jakel williams to tesla
3/3/2020	Cimone Nunley	Draft/ Revise	1.3	prepare Amy Oppenheimer doc privilege log
3/3/2020	Cimone Nunley	Research	0.4	research Jakel Williams in Vaughn case file
3/3/2020	Cimone Nunley	Draft/ Revise	0.9	draft ltr to West Valley re confidential designations
3/4/2020	Cimone Nunley	Communication	0.1	email to Sabrina Grislis w/tracking info for settlement check
3/4/2020	Cimone Nunley	Communication	0.1	email to tracey asking if 3/23 still works for her
3/4/2020	Cimone Nunley	Communication	0.1	email to Bernard- can he please hold 3/23 for meet and confer with OC
3/4/2020	Cimone Nunley	Communication	0.1	email to tracey kennedy confirming meeting at 1:00 PM on 3/23
3/4/2020	Cimone Nunley	Communication	0.1	email to bernard confirming phone conference with opposing counsel at 1:00 PM on 3/23
3/4/2020	Cimone Nunley	Draft/ Revise	2.2	complete drafting letter to West Valley re confidentiality designations
3/4/2020	Cimone Nunley	Communication	0.1	email copy of letter to West Valley to Sabrina Grislis with service instructions
3/4/2020	Cimone Nunley	Other	0.1	calendar deadlines re West Valley confidentiality challenge
3/4/2020	Cimone Nunley	Draft/ Revise	1.3	draft meet and confer letter to citistaff regarding overdesignations of docs

<b>Date</b>	<b>User</b>	<b>Activity</b>	<b>Time</b>	<b>Description</b>
3/4/2020	Cimone Nunley	Communication	0.1	email to Harry re resetting meeting
3/5/2020	Cimone Nunley	Communication	0.3	Telephone conference with Larry Organ re impeachment documents
3/5/2020	Cimone Nunley	Communication	0.2	Telephone conference with Cheryl Stevens of Lafayette Kumagai re confidential designations
3/5/2020	Cimone Nunley	Draft/ Revise	0.2	create summary of document confidentiality
3/6/2020	Cimone Nunley	Draft/ Revise	5.3	create updated privilege log and document production for Amy Oppenheimer docs
3/9/2020	Cimone Nunley	Communication	0.1	Voicemail to Judge Orrick's clerk re 3/10 telephone conference
3/9/2020	Cimone Nunley	Communication	0.3	call courtcall to set up telephonic appearance for 3/10 conference
3/9/2020	Cimone Nunley	Other	0.2	locate Amy Oppenheimer invoices and send to LO
3/9/2020	Cimone Nunley	Plan/ Prepare	0.1	update CourtCall info on calendar for tomorrow's telephone conference
3/10/2020	Cimone Nunley	Research	0.3	review local rules for filing notice of appearance in cases
3/10/2020	Cimone Nunley	Draft/ Revise	0.2	draft notice of appearance of counsel and send to Sabrina Grislis for filing
3/10/2020	Cimone Nunley	Communication	0.1	email to Helene attaching Orrick's rulings re confidentiality
3/10/2020	Cimone Nunley	Review/ Analyze	0.1	review email from Orrick's clerk re telephonic appearance
3/10/2020	Cimone Nunley	Communication	0.2	reply to Helene's email re confidentiality designations
3/10/2020	Cimone Nunley	Appearance/ Attend	0.3	attend telephonic hearing w/Orrick re scheduling (0.2), wait time of 0.1 before being heard
3/10/2020	Cimone Nunley	Communication	0.1	t/c with Cody of Amy's office re recent invoice
3/10/2020	Cimone Nunley	Communication	0.1	convey call w/Cody to LO
3/10/2020	Cimone Nunley	Meet	1.2	meet w/Larry Organ, Sabrina Grislis, SO to discuss case status and to do items
3/10/2020	Cimone Nunley	Review/ Analyze	0.6	review court's ruling on MSJs and confidential docs to prepare unredacted MSJ for filing

<b>Date</b>	<b>User</b>	<b>Activity</b>	<b>Time</b>	<b>Description</b>
3/11/2020	Cimone Nunley	Communication	0.1	discuss missed status conference w/ilman with Larry Organ
3/11/2020	Cimone Nunley	Communication	0.2	draft email to Illman
3/11/2020	Cimone Nunley	Plan/ Prepare	0.4	update pretrial checklist and deadlines based on info obtained from Orrick at yesterday's telephone conference
3/11/2020	Cimone Nunley	Communication	0.1	email to Amy Oppenheimer and Cody Holtz requesting copy of W-9
3/11/2020	Cimone Nunley	Draft/ Revise	0.6	draft email to Helene re confidentiality designations
3/11/2020	Cimone Nunley	Communication	0.4	discuss confidentiality challenge to West Valley with Larry Organ
3/11/2020	Cimone Nunley	Research	0.6	review federal MIL authority for background
3/11/2020	Cimone Nunley	Research	0.3	research FRE 902(9) self-authentication provision for business docs
3/11/2020	Cimone Nunley	Communication	0.1	Discussion with Cimone Nunley about witness Jackel Williams
3/12/2020	Cimone Nunley	Communication	0.1	email to Harry Plotkin and Bernard Alexander re timing of meeting today
3/12/2020	Cimone Nunley	Communication	0.1	email to SO to add additional witnesses to witness list
3/12/2020	Cimone Nunley	Communication	0.1	Telephone conference with Larry Organ re scheduling of call with Harry Plotkin and Bernard Alexander
3/12/2020	Cimone Nunley	Communication	0.1	email to Bernard Alexander and Harry Plotkin re setting up a call for tomorrow morning at 10:30
3/13/2020	Cimone Nunley	Other	0.1	update calendar entry for meet and confer session with opposing counsel
3/13/2020	Cimone Nunley	Plan/ Prepare	0.4	prepare docs and send to Sabrina Grislis for redactions/refiling
3/13/2020	Cimone Nunley	File/ Serve	0.2	help Sabrina Grislis efile unredacted MSJ and exhibits
3/13/2020	Cimone Nunley	Meet	1	meet w/Larry Organ, Bernard Alexander, Harry Plotkin re jury selection, MILs
3/13/2020	Cimone Nunley	Draft/ Revise	0.4	draft MILs
3/16/2020	Cimone Nunley	Communication	0.1	reply to Larry Organ email re adding an additional MIL to exclude witnesses



<b>Date</b>	<b>User</b>	<b>Activity</b>	<b>Time</b>	<b>Description</b>
3/16/2020	Cimone Nunley	Draft/ Revise	4.4	draft MILs
3/17/2020	Cimone Nunley	Communication	0.3	discuss MiL for Martinez's statement
3/17/2020	Cimone Nunley	Research	0.4	attempt to locate owen medical records in file
3/17/2020	Cimone Nunley	Draft/ Revise	3.2	draft MILs
3/18/2020	Cimone Nunley	Research	0.2	research origin of n word in bathroom
3/18/2020	Cimone Nunley	Draft/ Revise	4.1	draft MILs
3/18/2020	Cimone Nunley	Draft/ Revise	0.6	draft MILs
3/19/2020	Cimone Nunley	Plan/ Prepare	0.2	check orrick's calendar to see if new date set for pretrial conf
3/19/2020	Cimone Nunley	Draft/ Revise	7.9	Draft mils
3/20/2020	Cimone Nunley	Communication	0.3	Telephone Conference with Larry Organ re witness list; MILs
3/20/2020	Cimone Nunley	Draft/ Revise	6.9	draft MILs
3/21/2020	Cimone Nunley	Draft/ Revise	3.2	draft MILs
3/21/2020	Cimone Nunley	Research	1.1	research burden of proof in 1981
3/21/2020	Cimone Nunley	Communication	0.1	Phone call with Larry Organ regarding Plaintiff's MILs
3/21/2020	Cimone Nunley	Communication	0.1	Follow up phone call with Larry Organ regarding Plaintiff's MILs
3/22/2020	Cimone Nunley	Communication	0.5	Telephone call with Navruz Avloni and Larry Organ regarding Plaintiff's MILs
3/22/2020	Cimone Nunley	Draft/ Revise	5	draft MILs
3/22/2020	Cimone Nunley	Communication	0.5	Telephone conference with Bernard Alexander and Larry Organ re MILs and pretrial filings
3/22/2020	Cimone Nunley	Draft/ Revise	2.7	revise MILs in accordance with Navruz Avloni feedback and adjust formatting to be consistent with Northern District rules.

<b>Date</b>	<b>User</b>	<b>Activity</b>	<b>Time</b>	<b>Description</b>
3/23/2020	Cimone Nunley	Communication	0.5	Telephone calls with Larry Organ regarding MILs, Dr. Reading's report, and the trial brief
3/23/2020	Cimone Nunley	Communication	0.1	email to Sabrina Grislis re redactions on Dr Reading's report
3/23/2020	Cimone Nunley	Review/ Analyze	0.3	review Dr Reading's report to note potential areas of redaction
3/23/2020	Cimone Nunley	Communication	0.1	text message to Sabrina Grislis re marking exhibits
3/23/2020	Cimone Nunley	Draft/ Revise	5.7	draft trial brief
3/23/2020	Cimone Nunley	Draft/ Revise	8.1	draft MILs
3/24/2020	Cimone Nunley	Communication	0.1	Email to counsel for Tesla to remit payment to Amy Oppenheimer
3/24/2020	Cimone Nunley	Communication	0.2	Telephone call with Larry Organ and Navruz Avloni regarding me too witnesses, MILs, and punitive damages
3/24/2020	Cimone Nunley	Meet	0.7	Telephone meeting with Bernard Alexander, Larry Organ, and Susan Organ to discuss pre-trial tasks and strategy
3/25/2020	Cimone Nunley	Communication	0.4	Telephone conference with Bernard Alexander and Larry Organ to prepare for tomorrow's conference call with opposing counsel
3/25/2020	Cimone Nunley	Communication	0.4	Telephone conference with Larry Organ re claims to bring to trial, jury instructions
3/25/2020	Cimone Nunley	Draft/ Revise	2.5	brief issue of punitive damages under 1981
3/26/2020	Cimone Nunley	Meet	0.8	Telephone conference with Defense counsel re pretrial issues
3/26/2020	Cimone Nunley	Communication	0.3	Telephone conference with Bernard Alexander and Larry Organ re pretrial issues
3/26/2020	Cimone Nunley	Communication	0.1	email to Amy Oppenheimer re status of payment
3/26/2020	Cimone Nunley	Review/ Analyze	0.6	review MSJ and trial briefs to start preparing joint statement of facts
3/27/2020	Cimone Nunley	Meet	0.4	meet with Larry Organ, Navruz Avloni to discuss trial strategy
3/27/2020	Cimone Nunley	Communication	0.1	discuss me too witness task with Sabrina Grislis

Date	User	Activity	Time	Description
3/27/2020	Cimone Nunley	Plan/ Prepare	0.8	prepare list and questionnaire for me-too witnesses
3/27/2020	Cimone Nunley	Communication	0.1	Telephone conference with Larry Organ to confirm he will communicate planned dismissal to clients
3/27/2020	Cimone Nunley	Review/ Analyze	0.3	review pretrial docs in email and confirm all have been saved to DB
3/27/2020	Cimone Nunley	Review/ Analyze	0.2	review Titus McCaleb's deposition and preprepare revised questionnaire for Sabrina Grislis to use
3/30/2020	Cimone Nunley	Review/ Analyze	0.4	review Bernard Alexander's drafted brief re disputed issues of law
3/30/2020	Cimone Nunley	Communication	0.1	email to Bernard Alexander re brief on disputed issues of law
3/30/2020	Cimone Nunley	Communication	0.1	email to Bernard Alexander, Navruz Avloni, and Larry Organ requesting review of stip for partial dismissal
3/30/2020	Cimone Nunley	Other	0.2	review emails from Tracey Kennedy and Harry Plotkin and confirm everything saved to DB
3/30/2020	Cimone Nunley	Communication	0.2	Telephone conference with Larry Organ re faragher/ellerth
3/30/2020	Cimone Nunley	Communication	0.1	email to Bernard Alexander re faragher/ellerth issue
3/30/2020	Cimone Nunley	Communication	0.4	Telephone conference with Larry Organ re new 1981 supreme court case
3/30/2020	Cimone Nunley	Other	0.8	review recent supreme court decision re 1981
3/30/2020	Cimone Nunley	Meet	0.5	Meet with counsel for Tesla re pretrial topics
3/30/2020	Cimone Nunley	Communication	0.4	Telephone conference with Larry Organ, Bernard Alexander re joint pretrial to-do items
3/30/2020	Cimone Nunley	Review/ Analyze	0.1	review email from Tracey Kennedy enclosing updated jury questionnaire
3/31/2020	Cimone Nunley	Communication	0.1	review email from OC enclosing stip for continuance
3/31/2020	Cimone Nunley	Communication	0.2	t/c to Larry Organ to encourage him to review stip sent over by Sheppard Mullin
3/31/2020	Cimone Nunley	Draft/ Revise	0.3	revise stip in accordance w/Larry Organ edits and forward to BA
3/31/2020	Cimone Nunley	Research	0.2	locate witness jeff henry via people map and send to Sabrina Grislis

Date	User	Activity	Time	Description
3/31/2020	Cimone Nunley	Communication	0.1	reply to Bernard Alexander email enclosing revised stip for dismissal
3/31/2020	Cimone Nunley	Communication	0.1	email stip for dismissal to OC
4/1/2020	Cimone Nunley	Communication	0.1	review email thread re stip for continuance
4/1/2020	Cimone Nunley	Communication	0.1	review email from Tesla's counsel and Bernard Alexander attaching proposed changes to stip for dismissal
4/1/2020	Cimone Nunley	Draft/ Revise	0.1	review stip for dismissal and add electronic signatures
4/1/2020	Cimone Nunley	Draft/ Revise	0.1	draft signature attestation page for stip
4/1/2020	Cimone Nunley	Meet	0.5	meet with opposing counsel re pretrial issues
4/1/2020	Cimone Nunley	Communication	0.5	Telephone conference with Larry Organ and Bernard Alexander to discuss status of pretrial documents
4/1/2020	Cimone Nunley	Communication	0.1	email to Sabrina Grislis to confirm Amy Oppenheimer errata sheet goes to reporter today
4/1/2020	Cimone Nunley	File/ Serve	0.2	file joint stip for partial dismissal via ECF
4/1/2020	Cimone Nunley	Communication	0.1	Telephone conference with Larry Organ re stip on Plaintiff's MILs
4/1/2020	Cimone Nunley	Draft/ Revise	0.1	revise stip to exclude evidence re plaintiffs' MILs
4/1/2020	Cimone Nunley	Communication	0.1	email revised stip to OC
4/1/2020	Cimone Nunley	Draft/ Revise	2.8	draft pretrial statement (facts, action, relief prayed)
4/1/2020	Cimone Nunley	Communication	0.1	Telephone conference with Larry Organ re Judge Orrick's order granting stip to continue trial
4/2/2020	Cimone Nunley	Review/ Analyze	0.1	review minute order re status conference and double-check date/time calendared; save order to file
4/2/2020	Cimone Nunley	Review/ Analyze	0.2	review update deadlines calculated by Sabrina Grislis - email her to confirm they are correct and ok to proceed w/removing old d/l's and calendaring new ones

Date	User	Activity	Time	Description
4/2/2020	Cimone Nunley	Communication	0.1	reply to Bernard Alexander email re settlement discussion with opposing counsel
4/2/2020	Cimone Nunley	Communication	0.4	Telephone conference with Larry Organ re status of settlement, MIL opps
4/2/2020	Cimone Nunley	Communication	0.4	Telephone conference with Larry Organ and Bernard Alexander re settlement, MIL strategy
4/2/2020	Cimone Nunley	Research	2	prepare research for oppositions to Tesla's MILs
4/2/2020	Cimone Nunley	Draft/ Revise	1	revise our MILs
4/3/2020	Cimone Nunley	Review/ Analyze	0.1	review order granting stip re plaintiffs' MILs
4/3/2020	Cimone Nunley	Review/ Analyze	0.2	review file for information about former tesla employee jeff henry
4/3/2020	Cimone Nunley	Communication	0.1	email investigator Stuart Kohler the additional info re witness jeff henry
4/3/2020	Cimone Nunley	Research	0.3	search Facebook, linkedin, etc for Jeff Henry
4/3/2020	Cimone Nunley	Communication	0.2	email Larry Organ re language in 1981 jury instructions
4/3/2020	Cimone Nunley	Meet	0.4	meet with opposing counsel to address pretrial topics
4/3/2020	Cimone Nunley	Communication	0.1	Telephone conference with Larry Organ and Bernard Alexander re pretrial stuff
4/3/2020	Cimone Nunley	Plan/ Prepare	0.1	prepare redacted version of plaintiffs' exhibit 3
4/3/2020	Cimone Nunley	Communication	0.1	email to Sabrina Grislis with instructions for producing trial exhibit 3
4/3/2020	Cimone Nunley	Research	0.3	locate Wayne Jackson's facebook
4/3/2020	Cimone Nunley	Communication	0.2	Phone call with Larry Organ, Navruz Avloni, and Sabrina Grislis regarding witness information for trial subpoenas
4/6/2020	Cimone Nunley	Communication	0.1	review Sabrina Grislis and Stuart Kohler emails re status of locating witness jeff henry
4/6/2020	Cimone Nunley	Communication	0.1	reply to Navruz Avloni email re excluding evidence of Owen termination via MIL
4/6/2020	Cimone Nunley	Review/ Analyze	0.5	review Dr Reading's report to see if he attributes ED to job loss

<b>Date</b>	<b>User</b>	<b>Activity</b>	<b>Time</b>	<b>Description</b>
4/6/2020	Cimone Nunley	Communication	0.1	Telephone conference with Larry Organ re MIL to exclude discussion of Owen's performance
4/6/2020	Cimone Nunley	Draft/ Revise	0.7	revise pretrial statement re disputed issues of law and forward to Bernard Alexander
4/6/2020	Cimone Nunley	Review/ Analyze	0.4	review Susan Organ's prepared timeline and provide feedback
4/6/2020	Cimone Nunley	Communication	0.1	Phone call with Larry Organ, Navruz Avloni, and Sabrina Grislis regarding status of case
4/7/2020	Cimone Nunley	Communication	0.2	Telephone conference with Larry Organ to discuss 4/7 meeting with illman
4/7/2020	Cimone Nunley	Communication	0.1	Telephone conference with Sabrina Grislis to discuss witness decs and chart
4/7/2020	Cimone Nunley	Appearance/ Attend	0.3	attend status conference w/judge Judge Illman
4/7/2020	Cimone Nunley	Meet	0.4	meet with opposing counsel to discuss pretrial matters
4/7/2020	Cimone Nunley	Communication	0.6	Telephone conference with Larry Organ and Bernard Alexander to discuss jury instructions and preparation of pretrial statement
4/7/2020	Cimone Nunley	Review/ Analyze	0.1	confirm DL to update Judge Illman on status of settlement discussions calendared
4/7/2020	Cimone Nunley	Communication	0.6	Telephone conference with Navruz Avloni and Larry Organ re pretrial strategy and to-do list
4/8/2020	Cimone Nunley	Communication	0.1	leave voicemail for witness mitrel
4/8/2020	Cimone Nunley	Communication	0.1	email to Amy Oppenheimer to confirm she received payment for her deposition
4/8/2020	Cimone Nunley	Communication	0.1	Telephone call with Larry Organ regarding MIL on the exclusion of Owen Diaz's work performance
4/8/2020	Cimone Nunley	Communication	0.1	Phone meeting with Larry Organ, Navruz Avloni, and Sabrina Grislis regarding upcoming tasks
4/9/2020	Cimone Nunley	Review/ Analyze	0.7	review timeline slides prepared by Susan Organ and send her feedback
4/9/2020	Cimone Nunley	Communication	0.1	email to Sabrina Grislis re witness subpoenas for witnesses Tesla is also calling
4/9/2020	Cimone Nunley	Draft/ Revise	2.3	draft remaining portions of pretrial statement

<b>Date</b>	<b>User</b>	<b>Activity</b>	<b>Time</b>	<b>Description</b>
4/10/2020	Cimone Nunley	Other	0.6	update pretrial checklist/MyCase calendar and tasks
4/10/2020	Cimone Nunley	Meet	0.5	Phone meeting with Larry Organ, Bernard Alexander, Navruz Avloni, and Susan Organ regarding trial strategy and upcoming tasks
4/10/2020	Cimone Nunley	Draft/ Revise	1.7	draft pretrial statement
4/10/2020	Cimone Nunley	Communication	0.1	Phone call with Larry Organ regarding witnesses
4/11/2020	Cimone Nunley	Draft/ Revise	1	draft joint pretrial statement
4/13/2020	Cimone Nunley	Communication	0.2	Telephone conference with Larry Organ to discuss resetting call with OC
4/13/2020	Cimone Nunley	Communication	0.2	reply to Navruz Avloni/Larry Organ email re 1981 contract issue
4/13/2020	Cimone Nunley	Draft/ Revise	1	draft MILs
4/16/2020	Cimone Nunley	Meet	0.6	phone conference with opposing counsel
4/16/2020	Cimone Nunley	Communication	0.1	Telephone conference with Larry Organ to clarify two points from meeting
4/16/2020	Cimone Nunley	Meet	1	discuss trial strategy with Navruz Avloni and Larry Organ
4/16/2020	Cimone Nunley	Draft/ Revise	3.7	draft additional MIL re Rothaj Foster/revise MIL re Ramon Martinez
4/16/2020	Cimone Nunley	Draft/ Revise	0.1	revise proposed stip re pretrial deadlines
4/17/2020	Cimone Nunley	Draft/ Revise	0.3	revise MILs and forward revised MILs to OC
4/17/2020	Cimone Nunley	Meet	2.1	meet w/Harry Plotkin to discuss themes, etc
4/18/2020	Cimone Nunley	Communication	0.1	Phone call with Larry Organ regarding MILs
4/20/2020	Cimone Nunley	Communication	0.6	Telephone conference with Larry Organ re Wayne Jackson testimony and MILs
4/20/2020	Cimone Nunley	Draft/ Revise	6.1	revise MILs, prepare associated docs for filing, and file
4/21/2020	Cimone Nunley	Communication	0.5	Telephone conference with Larry Organ re opps to defendant's MILs
4/21/2020	Cimone Nunley	Draft/ Revise	3.5	draft opp to def MILs

<b>Date</b>	<b>User</b>	<b>Activity</b>	<b>Time</b>	<b>Description</b>
4/22/2020	Cimone Nunley	Communication	0.4	Telephone conference with Larry Organ to discuss MIL strategy
4/22/2020	Cimone Nunley	Draft/ Revise	4.5	draft opps to def MILs
4/22/2020	Cimone Nunley	Communication	0.1	Telephone call with Larry Organ and Navruz Avloni regarding jury instructions
4/23/2020	Cimone Nunley	Draft/ Revise	5.2	draft opp to def MILs
4/23/2020	Cimone Nunley	Communication	0.2	Phone call with Larry Organ regarding oppositions to Defendant's MILs
4/24/2020	Cimone Nunley	Meet	0.5	meet with opposing counsel re exhibits and jury instructions
4/24/2020	Cimone Nunley	Communication	0.3	Telephone conference with Larry Organ, Bernard Alexander re remaining pretrial tasks
4/24/2020	Cimone Nunley	Communication	0.2	Telephone conference with Larry Organ re remaining pretrial tasks and MILs
4/24/2020	Cimone Nunley	Draft/ Revise	7.3	draft MIL oppos
4/25/2020	Cimone Nunley	Draft/ Revise	6.5	draft MILs
4/26/2020	Cimone Nunley	Draft/ Revise	5.2	draft MIL oppos
4/26/2020	Cimone Nunley	Communication	0.7	Telephone conference with Larry Organ re MIL strategy, legal section, and federal rules of evidence 404 argument
4/27/2020	Cimone Nunley	Draft/ Revise	13.2	draft MIL oppos
4/27/2020	Cimone Nunley	Communication	0.2	Phone call with Larry Organ regarding contract theory issues
4/28/2020	Cimone Nunley	Communication	0.3	Telephone conference with Larry Organ re MIL/trial strategy
4/29/2020	Cimone Nunley	Communication	0.3	Telephone conference with Susan Organ re copyedits to MIL opps
4/29/2020	Cimone Nunley	Draft/ Revise	6.7	draft MIL oppos
4/29/2020	Cimone Nunley	Communication	0.1	Phone call with Larry Organ regarding Defense exhibits to MILs
4/29/2020	Cimone Nunley	Communication	0.1	Phone call with Larry Organ regarding MIL oppositions



Date	User	Activity	Time	Description
4/29/2020	Cimone Nunley	Communication	0.1	Phone call with Larry Organ regarding filing under seal and need to file MILs not under seal
4/30/2020	Cimone Nunley	Draft/ Revise	0.5	prepare unredacted MILs and supp dec for submission to the court and email to Sabrina Grislis
4/30/2020	Cimone Nunley	Plan/ Prepare	0.6	update pretrial checklist
5/1/2020	Cimone Nunley	Communication	0.2	Telephone conference with Larry Organ and Bernard Alexander re settlement status and demonstrative exhibits
5/4/2020	Cimone Nunley	Draft/ Revise	0.6	revise state court CMS and send to Sabrina Grislis for filing
5/4/2020	Cimone Nunley	Communication	0.1	Telephone conference with Larry Organ re state court CMS
5/4/2020	Cimone Nunley	Communication	0.1	email to Sabrina Grislis re state court CMC/CMS
5/4/2020	Cimone Nunley	Review/ Analyze	0.2	review text of tesla/nextsource MSA agreement and text analysis to Larry Organ
5/4/2020	Cimone Nunley	Communication	0.5	Telephone conference with Larry Organ re contract issue, evidence issue
5/4/2020	Cimone Nunley	Draft/ Revise	0.2	email to Tesla's counsel asking if they will agree to use of unredacted exhibit 3 for trial
5/5/2020	Cimone Nunley	Communication	0.1	reply to Susan Haines email re meeting and conferring on redactions to exhibit 3
5/5/2020	Cimone Nunley	Communication	0.1	email to Sabrina Grislis with instructions to set up meeting to discuss exhibit 3 redactions
5/6/2020	Cimone Nunley	Communication	0.3	Telephone conference with Sabrina Grislis re pretrial tasks and deadlines
5/6/2020	Cimone Nunley	Meet	1	meet w/susan haines re redactions to exh 3
5/6/2020	Cimone Nunley	Plan/ Prepare	0.1	prep for 2 PM call with Tesla counsel re redactions to trial exhibit 3
5/6/2020	Cimone Nunley	Communication	0.1	Phone call with Larry Organ regarding next steps
5/7/2020	Cimone Nunley	Review/ Analyze	0.1	review court's order re zoom pretrial conference
5/7/2020	Cimone Nunley	Communication	0.1	email to Bernard Alexander requesting availability for call to discuss MIL arguments

Date	User	Activity	Time	Description
5/7/2020	Cimone Nunley	Communication	0.1	email to Navruz Avloni to outline topics of discussion for Friday 5/8 meeting with Tesla counsel
5/7/2020	Cimone Nunley	Draft/ Revise	1.4	prepare chart of exhibits admissible vs authentic
5/7/2020	Cimone Nunley	Communication	0.2	email to OC re exhibit admissibility, witness info, exhibit marking status
5/7/2020	Cimone Nunley	Communication	0.5	Phone call with Bernard Alexander and Larry Organ regarding pretrial conference
5/8/2020	Cimone Nunley	Communication	0.7	conference call with opposing counsel re pretrial conference
5/8/2020	Cimone Nunley	Communication	0.8	Telephone conference with Larry Organ re oral argument on MILs
5/8/2020	Cimone Nunley	Plan/ Prepare	1.7	prep for oral argument re MILs
5/11/2020	Cimone Nunley	Communication	0.4	Telephone conference with Larry Organ, Bernard Alexander re MILs
5/11/2020	Cimone Nunley	Plan/ Prepare	3	prep for pretrial conference
5/11/2020	Cimone Nunley	Appearance/ Attend	1.4	appear @ pretrial conference
5/11/2020	Cimone Nunley	Communication	0.2	t/c with Navruz Avloni to update her on rulings on MILs
5/11/2020	Cimone Nunley	Communication	0.9	Telephone conference with Larry Organ re MILs
5/11/2020	Cimone Nunley	Communication	0.1	review Vaughn file to see if we have any docs that confirm witness Nigel Jones's dates of employment for opposition to Tesla MILs
5/11/2020	Cimone Nunley	Communication	0.1	t/c with nigel jones to ask if he has any docs re initial hire at tesla
5/13/2020	Cimone Nunley	Communication	0.1	email to Harry to advise we should hold off on focus group for now
5/13/2020	Cimone Nunley	Communication	0.1	email to Amy Oppenheimer re new trial date
5/13/2020	Cimone Nunley	Communication	0.1	email to Dr. Reading re new trial date
5/14/2020	Cimone Nunley	Communication	0.3	Telephone conference with Larry Organ re MILs
5/19/2020	Cimone Nunley	Communication	0.2	Telephone conference with Larry Organ re current status and next steps

<b>Date</b>	<b>User</b>	<b>Activity</b>	<b>Time</b>	<b>Description</b>
5/22/2020	Cimone Nunley	Communication	0.7	Telephone conference with Bernard Alexander, Larry Organ, Navruz Avloni re MIL rulings and next steps
5/27/2020	Cimone Nunley	Communication	0.1	review email from Harry Plotkin re new trial date
5/27/2020	Cimone Nunley	Communication	0.1	email to Sabrina Grislis requesting updated trial dates
6/10/2020	Cimone Nunley	Review/ Analyze	0.1	review updated trial deadlines prepared by Teodora Gagauz and provide feedback
6/17/2020	Cimone Nunley	Plan/ Prepare	1.1	create updated pretrial checklist
6/17/2020	Cimone Nunley	Meet	1.6	meet w/Sabrina Grislis, Larry Organ, Susan Organ, Bernard Alexander, Harry Plotkin to discuss themes and division of labor re trial
7/1/2020	Cimone Nunley	Review/ Analyze	0.1	review citistaff state court CMS
7/20/2020	Cimone Nunley	Communication	0.1	email Harry Plotkin proposed jury instructions
7/28/2020	Cimone Nunley	Other	0.2	pull depo transcripts and MSJ docs and send to mika hillaire in preparation for focus group
7/29/2020	Cimone Nunley	Meet	0.7	meeting re focus group
7/29/2020	Cimone Nunley	Communication	0.1	review slides from Susan Organ and provide feedback
7/30/2020	Cimone Nunley	Communication	0.1	review email with questions from mika hillaire regarding focus group
7/30/2020	Cimone Nunley	Communication	0.1	text to Larry Organ re inviting Mika Hillaire to next week's trial team meeting
7/30/2020	Cimone Nunley	Communication	0.1	email to Harry Plotkin with info re date/time of next meeting with mika hillaire for focus group
7/30/2020	Cimone Nunley	Communication	0.1	email to Harry Plotkin re focus group meeting day/time
7/31/2020	Cimone Nunley	Communication	0.1	review email thread between Larry Organ and Mika Hillaire re focus group, reply to her questions re wife's mental health and alternate stressors
7/31/2020	Cimone Nunley	Communication	0.1	remind Larry Organ to send email attachments to harry plotkin before focus group

<b>Date</b>	<b>User</b>	<b>Activity</b>	<b>Time</b>	<b>Description</b>
7/31/2020	Cimone Nunley	Communication	0.1	Discussion with Navruz Avloni regarding meet and confer letter to Tesla re pretrial matters
8/6/2020	Cimone Nunley	Meet	1.3	meet to prep for focus group
8/6/2020	Cimone Nunley	Plan/ Prepare	0.9	work on prepping info for Mika Hillaire for focus group
8/7/2020	Cimone Nunley	Communication	0.1	Telephone conference with Larry Organ re depo videos
8/7/2020	Cimone Nunley	Communication	0.1	review and reply to gus ham's email requesting depo videos for syncing
8/7/2020	Cimone Nunley	Plan/ Prepare	2.8	prepare focus group materials for mika hillaier
8/8/2020	Cimone Nunley	Plan/ Prepare	3	prepare focus group docs and items for Mika hillaire
8/11/2020	Cimone Nunley	Communication	0.1	Telephone conference with Larry Organ re focus group prep
8/11/2020	Cimone Nunley	Meet	1.2	meeting re focus group
8/13/2020	Cimone Nunley	Communication	0.1	Telephone conference with Sabrina Grislis re videos for focus group
8/14/2020	Cimone Nunley	Meet	0.4	meet w/Larry Organ,Susan Organ, Sabrina Grislis re focus group preparations
8/14/2020	Cimone Nunley	Draft/ Revise	0.9	fill in missing info from cast of characters
8/14/2020	Cimone Nunley	Communication	0.1	email revised cast of characters to Mika Hillaire for focus group
8/15/2020	Cimone Nunley	Draft/ Revise	0.2	update cast of characters and send to Harry Plotkin
8/15/2020	Cimone Nunley	Appearance/ Attend	4	attend focus group
8/15/2020	Cimone Nunley	Meet	0.9	meet w/Susan Organ, Larry Organ, Navruz Avloni, Harry Plotkin, Bernard Alexander and dustin collier re trial and jury selection strategy
8/17/2020	Cimone Nunley	Meet	0.2	team meeting
8/18/2020	Cimone Nunley	Communication	0.1	Phone call with Larry Organ regarding trial exhibits
8/19/2020	Cimone Nunley	Meet	1.6	meet re focus group and future strategy

Date	User	Activity	Time	Description
9/1/2020	Cimone Nunley	Communication	0.1	Telephone conference with Larry Organ, Bernard Alexander re new trial date
9/1/2020	Cimone Nunley	Communication	0.1	Telephone conference with Larry Organ re new trial date and to do list
9/1/2020	Cimone Nunley	Appearance/ Attend	0.2	attend trial setting conf
9/1/2020	Cimone Nunley	Communication	0.1	email to Reading to notify of new trial date
9/3/2020	Cimone Nunley	Communication	0.1	email to Bernard Alexander, Larry Organ, Navruz Avloni re settlement conference
9/8/2020	Cimone Nunley	Communication	0.1	Telephone conference with Larry Organ to get availability for MSC
9/8/2020	Cimone Nunley	Communication	0.1	email to Tracey Kennedy providing our availability for MSC
9/9/2020	Cimone Nunley	Communication	0.1	email to Sabrina Grislis with instructions for calendaring MSC, taking scheduling conf off calendar, etc.
9/9/2020	Cimone Nunley	Communication	0.1	email to Bernard Alexander re latest settlement demand
9/10/2020	Cimone Nunley	Communication	0.1	Call with Larry Organ regarding the settlement conference statement
9/23/2020	Cimone Nunley	Communication	0.1	Phone call with Larry Organ, Navruz Avloni, and Sabrina Grislis regarding the settlement conference
10/22/2020	Cimone Nunley	Communication	0.2	call with Navruz Avloni re setting agenda for tomorrow afternoon's meeting on diaz
10/22/2020	Cimone Nunley	Draft/ Revise	0.8	create planning checklist for 10/23 meeting re trial preparation and strategy
10/22/2020	Cimone Nunley	Communication	0.1	email checklist for tomorrow's meeting to everyone
10/22/2020	Cimone Nunley	Draft/ Revise	0.7	work on revising settlement conference statement
10/23/2020	Cimone Nunley	Meet	0.9	trial team meeting to discuss next steps
10/28/2020	Cimone Nunley	Draft/ Revise	4.1	draft settlement conf statement
10/29/2020	Cimone Nunley	Draft/ Revise	2.7	draft settlement conf statement
10/30/2020	Cimone Nunley	Draft/ Revise	0.4	finalize MSC statement and send to illman

Date	User	Activity	Time	Description
11/2/2020	Cimone Nunley	Plan/ Prepare	0.7	prepare outline for meeting and send to trial team
11/2/2020	Cimone Nunley	Meet	1	trial team meeting
11/13/2020	Cimone Nunley	Appearance/ Attend	1.1	attend MSC
11/13/2020	Cimone Nunley	Communication	0.3	Telephone conference with Sabrina Grislis re recalendaring deadlines
11/13/2020	Cimone Nunley	Review/ Analyze	0.9	review/update Bernard Alexander's case outline
11/13/2020	Cimone Nunley	Communication	0.2	Telephone call with client, Bernard Alexander, and Larry Organ regarding the mediators proposal
11/13/2020	Cimone Nunley	Communication	0.5	Post settlement conference debrief call with Bernard Alexander and Larry Organ
11/16/2020	Cimone Nunley	Draft/ Revise	0.1	download minute entry for MSC and save to file
11/16/2020	Cimone Nunley	Review/ Analyze	0.6	review Bernard Alexander case outline and provide feedback
11/20/2020	Cimone Nunley	Communication	0.2	Telephone conference with Larry Organ to provide RMI settlement email
11/28/2020	Cimone Nunley	Communication	0.1	Phone call with Larry Organ regarding exhibits
12/4/2020	Cimone Nunley	Plan/ Prepare	1.2	work on exhibit chart in advance of monday meeting with Tesla counsel
12/7/2020	Cimone Nunley	Plan/ Prepare	0.7	prep for meeting with OC re exhibit admissibility
12/7/2020	Cimone Nunley	Communication	0.1	Telephone conference with Larry Organ re meeting with OC over exhibit admissibility
12/7/2020	Cimone Nunley	Meet	0.8	meet with opposing counsel re exhibits and pretrial issues
12/7/2020	Cimone Nunley	Communication	0.2	email experts re new trial date
12/8/2020	Cimone Nunley	Communication	0.1	Telephone conference with Sabrina Grislis re calling witnesses
12/8/2020	Cimone Nunley	Communication	0.1	Discussion with Larry Organ regarding witnesses
12/8/2020	Cimone Nunley	Communication	0.3	Call with Bernard Alexander and Larry Organ regarding trial continuance
12/15/2020	Cimone Nunley	Appearance/ Attend	0.5	attend CMC

<b>Date</b>	<b>User</b>	<b>Activity</b>	<b>Time</b>	<b>Description</b>
12/15/2020	Cimone Nunley	Appearance/ Attend	0.5	attend MSC
12/16/2020	Cimone Nunley	Other	0.5	recalculate and recalendar case deadlines to conform with new trial date
12/17/2020	Cimone Nunley	Other	0.1	update MSC calendar entry with dial in information
1/15/2021	Cimone Nunley	Review/ Analyze	0.1	review state court CMS prepped by Sabrina Grislis and provide feedback
2/1/2021	Cimone Nunley	Review/ Analyze	0.1	review state court CMC order
2/11/2021	Cimone Nunley	Communication	0.2	Telephone conference with Larry Organ re potential continuance
2/11/2021	Cimone Nunley	Communication	0.1	email to Bernard Alexander re potential continuance
2/11/2021	Cimone Nunley	Communication	0.1	email to OC proposing a call to select alternative trial dates
2/16/2021	Cimone Nunley	Communication	0.4	zoom call with opposing counsel to agree on alternative trial dates
2/17/2021	Cimone Nunley	Draft/ Revise	0.7	draft stip for continuance
2/17/2021	Cimone Nunley	Communication	0.1	send stip for continuance to Larry Organ/Bernard Alexander/Navruz Avloni for review
2/17/2021	Cimone Nunley	Draft/ Revise	0.1	modify stip for continuance based on Navruz Avloni feedback
2/17/2021	Cimone Nunley	Communication	0.1	send stip for trial continuance to OC
3/1/2021	Cimone Nunley	Communication	0.1	email to OC advising i will file trial stip today
3/1/2021	Cimone Nunley	File/ Serve	0.3	file stip for continuance
3/1/2021	Cimone Nunley	Draft/ Revise	0.2	add electronic signatures and signature affirmation to stip, finalize stip for filing
3/2/2021	Cimone Nunley	Review/ Analyze	0.1	review order granting continuance
3/2/2021	Cimone Nunley	Communication	0.1	email to Harry re new trial date
3/2/2021	Cimone Nunley	Communication	0.1	email to Amy Oppenheimer re new trial date
3/2/2021	Cimone Nunley	Communication	0.1	email to karen @ dr reading's office with new date

Date	User	Activity	Time	Description
3/2/2021	Cimone Nunley	Communication	0.1	Call with Larry Organ regarding trial continuance and settlement conference
3/4/2021	Cimone Nunley	Communication	0.1	update calendar with dial in info for 6/15 settlement conference
3/4/2021	Cimone Nunley	Communication	0.1	email Bernard Alexander with dial in info for 6/15 settlement conf
4/23/2021	Cimone Nunley	Communication	0.1	email to bernard alexander regarding setting up a status meeting
4/28/2021	Cimone Nunley	Communication	0.1	email to bernard alexander to set up status meeting on 5/24
6/15/2021	Cimone Nunley	Appearance/ Attend	0.2	attend status conference with settlement judge illman
6/15/2021	Cimone Nunley	Communication	0.2	call with bernard alexander and larry organ re settlement status conference and next steps
6/22/2021	Cimone Nunley	Meet	0.8	Meet with Larry Organ, Bernard Alexander, and Sabrina Grislis for trial prep
7/16/2021	Cimone Nunley	Meet	1.1	Meet with Larry Organ and Bernard Alexander to prepare for opening and trial
7/19/2021	Cimone Nunley	Meet	1.7	meet w/client Owen Diaz and team (larry organ, navruz avloni, susan organ, sabrina grislis) to discuss case status, mitigation of damages
7/20/2021	Cimone Nunley	Draft/ Revise	0.6	draft sample focus group topics for Larry Organ
7/21/2021	Cimone Nunley	Communication	0.1	call with sabrina grislis re locating and subpoenaing trial witnesses
7/27/2021	Cimone Nunley	Communication	0.3	Phone call with Larry Organ, Bernard Alexander, and Harry Plotkin regarding focus group
8/3/2021	Cimone Nunley	Review/ Analyze	0.1	review state court CMS and give feedback to sabrina grislis
8/10/2021	Cimone Nunley	Appearance/ Attend	0.1	Appear at the case management conference
8/11/2021	Cimone Nunley	Communication	0.1	reply to email from Harry Plotkin clarifying proposed voir dire dates and times
8/11/2021	Cimone Nunley	Other	0.1	review minute order from 8/10 CMC and calendar dates for 9/7 CMC
8/16/2021	Cimone Nunley	Communication	0.1	email to harry plotkin to advise he can fly in to SF on 9/23 for jury selection if 9/27 trial date proceeds



Date	User	Activity	Time	Description
8/16/2021	Cimone Nunley	Other	0.2	check state court website for updated case management order
8/16/2021	Cimone Nunley	Communication	0.1	email updated state court case management order to sabrina grislis and request she calendar new deadlines
8/16/2021	Cimone Nunley	Meet	4.2	team meeting to discuss trial prep and focus group planning
8/16/2021	Cimone Nunley	Communication	0.2	email to larry organ with bullet points to address with bernard alexander
8/16/2021	Cimone Nunley	Other	0.2	prepare task list for the week and circulate to navruz avloni, sabrina grislis, and larry organ
8/17/2021	Cimone Nunley	Communication	0.1	email to bernard alexander, harry plotkin, and larry organ proposing 8/18 meeting date
8/17/2021	Cimone Nunley	Communication	0.1	ask sabrina grislis to prepare and send calendar invite for 8/18 meeting with harry plotkin, bernard alexander, and larry organ
8/18/2021	Cimone Nunley	Meet	1.3	Meet with harry plotkin, bernard alexander, larry organ, sabrina grislis, and navruz avloni regarding upcoming focus group and trial strategy
8/18/2021	Cimone Nunley	Communication	0.2	call with sabrina grislis re serving witnesses with trial subpoenas
8/18/2021	Cimone Nunley	Review/ Analyze	0.4	review johnson v pride industries case from 5th cir (1981 case)
8/18/2021	Cimone Nunley	Review/ Analyze	0.4	review proposed survey and craigslist ad prepared by sabrina grislis for internal focus group
8/18/2021	Cimone Nunley	Communication	0.1	email to sabrina grislis enclosing my feedback on focus group materials
8/24/2021	Cimone Nunley	Communication	0.1	call with Larry Organ re focus group logistics
8/24/2021	Cimone Nunley	Communication	0.4	draft email to tracey kennedy re pretrial issues and send to larry organ for review
8/24/2021	Cimone Nunley	Draft/ Revise	1.9	prepare demonstratives and statements for 9/4 focus group
8/25/2021	Cimone Nunley	Review/ Analyze	0.5	review depositions to confirm which witnesses defendant will accept service for
8/25/2021	Cimone Nunley	Communication	0.1	send email to opposing counsel tracey kennedy, susan haines, patricia jeng, and stephanie limbaugh re evidence, witness, potential new trial dates, and jury instructions

<b>Date</b>	<b>User</b>	<b>Activity</b>	<b>Time</b>	<b>Description</b>
8/25/2021	Cimone Nunley	Other	4	prepare presentations for focus group
8/26/2021	Cimone Nunley	Plan/ Prepare	2.6	prepare presentations for focus group
8/27/2021	Cimone Nunley	Communication	0.3	call with lawrence a. organ re email from opposing counsel patricia jeng
8/27/2021	Cimone Nunley	Communication	0.3	email to opposing counsel patricia jeng regarding her email re new trial dates, witnesses, tabbed trial exhibits, jury instructions/questionnaire, and language to use re demetric's felony
8/27/2021	Cimone Nunley	Communication	0.1	email to navruz avloni, larry organ, bernard alexander, and harry plotkin to solicit any feedback/changes for jury questionnaire
8/27/2021	Cimone Nunley	Communication	0.1	email to navruz avloni, larry organ, and bernard alexander re language for demetric's felonies
8/27/2021	Cimone Nunley	Communication	0.1	text to client requesting copy of demetric's plea deal
8/27/2021	Cimone Nunley	Communication	0.1	call with client re demetric's convictions/plea deal
8/27/2021	Cimone Nunley	Plan/ Prepare	1.8	prepare presentations for focus group
8/28/2021	Cimone Nunley	Communication	0.1	email to larry organ, navruz avloni, and bernard alexander requesting feedback on language to use re demetric's felonies
8/28/2021	Cimone Nunley	Other	3.7	prepare focus group presentations
8/29/2021	Cimone Nunley	Plan/ Prepare	3.7	prepare scripts for focus group
8/30/2021	Cimone Nunley	Communication	0.3	call to Demetric Di-az's criminal attorney to request copy of plea agreement
8/31/2021	Cimone Nunley	Plan/ Prepare	5.3	prepare scripts for focus group
9/1/2021	Cimone Nunley	Communication	0.2	call with sabrina grislis re selection of focus group participants
9/1/2021	Cimone Nunley	Review/ Analyze	0.8	review responses to focus group survey and provide sabrina grislis with feedback on selections via email
9/1/2021	Cimone Nunley	Draft/ Revise	0.3	draft and send letter to demetric's criminal attorney requesting copy of plea agreement

<b>Date</b>	<b>User</b>	<b>Activity</b>	<b>Time</b>	<b>Description</b>
9/1/2021	Cimone Nunley	Plan/ Prepare	4.2	create powerpoints for focus group
9/2/2021	Cimone Nunley	Communication	0.2	call with larry organ re status of focus group tasks
9/2/2021	Cimone Nunley	Plan/ Prepare	3.9	prepare slideshow for focus group
9/3/2021	Cimone Nunley	Meet	0.1	meeting with sabrina grislis and larry organ re focus group logistics
9/3/2021	Cimone Nunley	Communication	0.4	call with lawrence organ re logistics for 9/5 focus group
9/3/2021	Cimone Nunley	Communication	0.2	call with sabrina grislis re post-focus group questionnaire
9/3/2021	Cimone Nunley	Plan/ Prepare	2.7	draft presenter script for 9/3 focus group
9/4/2021	Cimone Nunley	Plan/ Prepare	2.5	prepare moderator script for focus group
9/5/2021	Cimone Nunley	Appearance/ Attend	4.1	attend focus groups
9/5/2021	Cimone Nunley	Meet	0.4	Meet with Larry Organ, Navruz Avloni, Sabrina Grislis, and Susan Organ after focus groups to debrief
9/5/2021	Cimone Nunley	Plan/ Prepare	0.7	Prepare for the focus groups
9/7/2021	Cimone Nunley	Appearance/ Attend	0.2	attend CMC
9/7/2021	Cimone Nunley	Communication	0.4	call with larry organ and bernard alexander to discuss strategy for opening in the next couple weeks
9/7/2021	Cimone Nunley	Communication	0.3	call with larry organ re trial strategy
9/9/2021	Cimone Nunley	Plan/ Prepare	5.2	prep client for trial testimony
9/9/2021	Cimone Nunley	Meet	4.9	Meet with client Owen Diaz, Larry Organ, Susan Organ, and Bernard Alexander for trial prep
9/9/2021	Cimone Nunley	Meet	0.3	Meet with Larry Organ and Bernard Alexander regarding trial tasks
9/10/2021	Cimone Nunley	Communication	0.4	call with larry organ re trial logistics

<b>Date</b>	<b>User</b>	<b>Activity</b>	<b>Time</b>	<b>Description</b>
9/10/2021	Cimone Nunley	Meet	1.3	meet with larry organ, navruz avlioni, bernard alexander, susan organ, and sabrina grislis to discuss trial preparations
9/13/2021	Cimone Nunley	Plan/ Prepare	4.6	prepare client for trial testimony
9/15/2021	Cimone Nunley	Draft/ Revise	2.1	prepare witness examinations
9/15/2021	Cimone Nunley	Meet	1	meet with bernard alexander, larry organ, and susan organ to discuss witness examinations
9/15/2021	Cimone Nunley	Communication	0.5	Discussion with Larry Organ and Susan Organ regarding Veronica Martinez and Jackelin Delgado testimony
9/16/2021	Cimone Nunley	Meet	1	Meet with Larry Organ, Bernard Alexander, and Susan Organ regarding witness testimony and witness order
9/17/2021	Cimone Nunley	Communication	0.2	send email to opposing counsel patricia jeng regarding incomplete exhibit list; witness erin marconi; and zoom appearance at pretrial conference
9/17/2021	Cimone Nunley	Plan/ Prepare	2.5	prepare client to testify at trial
9/17/2021	Cimone Nunley	Communication	0.1	call witness La'Drea Jones to schedule deposition prep meeting
9/17/2021	Cimone Nunley	Communication	0.1	email la'drea copy of her deposition testimony and a reminder for our prep meeting on 9/22 at 4 PM
9/17/2021	Cimone Nunley	Draft/ Revise	1.6	prepare witness examinations
9/19/2021	Cimone Nunley	Meet	1.5	Meet with Larry Organ, Bernard Alexander, and Susan Organ to prepare for opening statement
9/20/2021	Cimone Nunley	Communication	0.2	Phone call with Larry Organ regarding verdict form and jury instructions
9/21/2021	Cimone Nunley	Communication	0.2	Attempt to call witness Erin Marconi at 3 previously-identified numbers
9/21/2021	Cimone Nunley	Communication	0.3	Call all numbers listed in investigator's search for Erin Marconi and leave voicemails for working numbers
9/21/2021	Cimone Nunley	Research	0.2	Conduct people map search for witness Erin Marconi

<b>Date</b>	<b>User</b>	<b>Activity</b>	<b>Time</b>	<b>Description</b>
9/21/2021	Cimone Nunley	Communication	0.1	Call and leave voicemails for all potential phone numbers identified for Erin Marconi via people map search
9/21/2021	Cimone Nunley	Communication	0.3	Email to Wayne Jackson providing copy of his deposition transcript + exhibits, courthouse address, and anticipated testimony date/time
9/21/2021	Cimone Nunley	Communication	0.1	Email to former Citistaff counsel Constangy Brooks et al advising subsequent Citistaff counsel (Lafayette & Kumagai) is not responding to our communications and requesting Monica deLeon's last best known contact address for service
9/21/2021	Cimone Nunley	Communication	0.1	Email to Bernard Alexander, Larry Organ, Sabrina Grislis, and Navruz Avloni regarding status of witness subpoena service
9/21/2021	Cimone Nunley	Appearance/ Attend	1	Attend final pretrial conference
9/21/2021	Cimone Nunley	Communication	0.9	Call with Bernard Alexander regarding final pretrial preparations
9/21/2021	Cimone Nunley	Plan/ Prepare	2.1	Prepare examination for witness La'Drea Jones
9/21/2021	Cimone Nunley	Other	1	Prepare annotated jury instructions with Judge Orrick's rulings from the bench at 9/21 conference
9/21/2021	Cimone Nunley	Meet	0.3	Meet with Larry Organ regarding strategy
9/21/2021	Cimone Nunley	Communication	0.1	Discussion with Navruz Avloni regarding witness logistics relating to vaccination status and IDs
9/22/2021	Cimone Nunley	Communication	0.3	Call with Navruz Avloni regarding supplemental briefing on admissibility of me-too witness testimony
9/22/2021	Cimone Nunley	Plan/ Prepare	1.6	Practice opening statement with Bernard Alexander
9/22/2021	Cimone Nunley	Plan/ Prepare	5.1	Prepare examinations for witnesses Monica DeLeon, La'Drea Jones, and Jackelin Delgado
9/22/2021	Cimone Nunley	Communication	0.1	Call with Sabrina Grislis regarding outstanding trial tasks
9/23/2021	Cimone Nunley	Review/ Analyze	0.3	Review Defendant Tesla, Inc.'s demonstrative exhibits and advise Larry Organ of objections

<b>Date</b>	<b>User</b>	<b>Activity</b>	<b>Time</b>	<b>Description</b>
9/23/2021	Cimone Nunley	Other	0.9	Ddrop off supplies, test technology hookups, and arrange counsel table at CA Northern District courthouse; travel time to and from
9/23/2021	Cimone Nunley	Review/ Analyze	0.6	Review Defendant Tesla, Inc.'s supplemental brief regarding designated deposition testimony from Demetric Di-az
9/23/2021	Cimone Nunley	Meet	0.6	Meet with Harry Plotkin, Lawrence Organ, Navruz Avloni, and Bernard Alexander regarding juror selection
9/23/2021	Cimone Nunley	Review/ Analyze	1	Review, finalize, and file jury instructions in Plaintiff's proposed order
9/23/2021	Cimone Nunley	Plan/ Prepare	4.6	Prepare examinations for witnesses Monica DeLeon and La'Drea Jones
9/23/2021	Cimone Nunley	Draft/ Revise	0.3	Draft pocket brief regarding proposed jury instruction 5
9/24/2021	Cimone Nunley	Appearance/ Attend	7.2	Travel to Northern District courthouse for jury selection; attend jury selection conference; return travel to office
9/24/2021	Cimone Nunley	Plan/ Prepare	5	Prepare examination for witness Monica DeLeon
9/24/2021	Cimone Nunley	Meet	0.3	Meet with Larry Organ and Bernard Alexander regarding Monica DeLeon testimony
9/24/2021	Cimone Nunley	Meet	0.3	Meet with Larry Organ and Bernard Alexander regarding witnesses and witness order
9/25/2021	Cimone Nunley	Plan/ Prepare	2	Rehearse opening statement with Bernard Alexander
9/25/2021	Cimone Nunley	Plan/ Prepare	6	Prepare examinations for witnesses La'Drea Jones (2.7) and Monica DeLeon (3.1)
9/26/2021	Cimone Nunley	Plan/ Prepare	1	Meet with witness La'Drea Jones regarding her testimony
9/26/2021	Cimone Nunley	Review/ Analyze	1.5	Review Federal Rules of Evidence to ensure familiarity in advance of trial.
9/26/2021	Cimone Nunley	Plan/ Prepare	5	Prepare chart outlining inaccuracies in Defendant Tesla, Inc.'s opening statement slideshow
9/26/2021	Cimone Nunley	Draft/ Revise	2.2	Prepare examinations for witnesses Jackelin Delgado and Monica DeLeon
9/27/2021	Cimone Nunley	Appearance/ Attend	7.6	Travel to and from courthouse, appear for trial day 1.

<b>Date</b>	<b>User</b>	<b>Activity</b>	<b>Time</b>	<b>Description</b>
9/27/2021	Cimone Nunley	Communication	0.6	Phone conference with Larry Organ, Navruz Avloni, Bernard Alexander, and Sabrina Grislis to debrief, discuss strategy, and tasks
9/27/2021	Cimone Nunley	Meet	0.6	Meet with Larry Organ, Bernard Alexander, Susan Organ, and Sabrina Grislis regarding additional tasks
9/28/2021	Cimone Nunley	Communication	0.1	Email to opposing counsel Patricia Jeng advising her of the following day's witness order
9/28/2021	Cimone Nunley	Communication	0.1	Email to witness La'Drea Jones advising her of the anticipated time of her testimony.
9/28/2021	Cimone Nunley	Appearance/ Attend	7.6	Appear at trial at CAND courthouse; travel to/from courthouse
9/28/2021	Cimone Nunley	Plan/ Prepare	0.7	Prepare redacted version of Tesla/Nextsource services agreement per request of opposing counsel Tracey Kennedy on 9/28
9/28/2021	Cimone Nunley	Communication	0.1	Email to opposing counsel Tracey Kennedy, Patricia Jeng, and Susan Haines regarding admitting exhibits we planned to introduce via Heisen
9/28/2021	Cimone Nunley	File/ Serve	2.5	Draft and file designations from Annalisa Heisen's deposition testimony
9/28/2021	Cimone Nunley	Communication	0.4	Draft email to opposing counsel patricia jeng to reject her proposal of stipulating to the admissibility of Exhibits 3 and 6 in exchange for Exhibit 379.
9/29/2021	Cimone Nunley	Appearance/ Attend	7.5	Appear for day 3 of trial; travel to/from courthouse
9/29/2021	Cimone Nunley	Draft/ Revise	1	Prepare revised designations of Defendant Tesla, Inc.'s discovery responses
9/29/2021	Cimone Nunley	Communication	0.2	Email to opposing counsel Tracey Kennedy, Patricia Jeng, and Susan Haines with tomorrow's witness order and discovery designations
9/29/2021	Cimone Nunley	Plan/ Prepare	1	Revise and practice La'Drea Jones examination
9/29/2021	Cimone Nunley	Review/ Analyze	0.5	Review La'Drea Jones's deposition to prepare for her examination
9/29/2021	Cimone Nunley	Draft/ Revise	1.8	Prepare objections to the Court's draft jury instructions



Date	User	Activity	Time	Description
9/29/2021	Cimone Nunley	File/ Serve	0.1	File objections to the Court's draft jury instructions
9/29/2021	Cimone Nunley	Meet	0.8	Meet with Bernard Alexander, Larry Organ, Navruz Avloni, and Sabrina Grislis to strategize regarding witness testimony
9/30/2021	Cimone Nunley	Review/ Analyze	0.8	Review and condense designated deposition testimony of Annalisa Heisen
9/30/2021	Cimone Nunley	Draft/ Revise	2.8	Prepare objections to Defendant Tesla, Inc.'s objections to jury instructions
9/30/2021	Cimone Nunley	Appearance/ Attend	7	Attend day 4 of trial; travel to and from courthouse
9/30/2021	Cimone Nunley	Review/ Analyze	0.3	Review designations from Erin Marconi and Demetric Di-az's testimony for submission to the Court
9/30/2021	Cimone Nunley	Draft/ Revise	0.2	Finalize reply to Defendant Tesla, Inc.'s objections to the Court's draft jury instructions based on feedback from Larry Organ
9/30/2021	Cimone Nunley	File/ Serve	0.1	File reply to Defendant Tesla, Inc.'s objections to draft final jury instructions
9/30/2021	Cimone Nunley	Meet	2.2	Meet with Larry Organ, Bernard Alexander, Sabrina Grislis, Navruz Avloni, and Susan Organ to discuss remaining tasks and strategy
10/1/2021	Cimone Nunley	Appearance/ Attend	6.8	Appear for closing arguments and instructions conference; travel to and from
10/1/2021	Cimone Nunley	Meet	3	Meet with Bernard Alexander, Susan Organ, Larry Organ, and Navruz Avloni regarding closing powerpoint presentation
10/1/2021	Cimone Nunley	Draft/ Revise	4.5	Prepare closing powerpoint slides
10/2/2021	Cimone Nunley	Draft/ Revise	7.1	Draft opposition to Defendant Tesla, Inc.'s motion for judgment as a matter of law
10/2/2021	Cimone Nunley	Draft/ Revise	0.5	Draft objections to the Court's proposed verdict form
10/2/2021	Cimone Nunley	Draft/ Revise	0.5	Draft response to Defendant Tesla, Inc.'s objection to proposed verdict form
10/2/2021	Cimone Nunley	File/ Serve	0.1	File objection to the Court's proposed verdict form
10/2/2021	Cimone Nunley	File/ Serve	0.1	File response to Defendant Tesla, Inc.'s objection to proposed verdict form



<b>Date</b>	<b>User</b>	<b>Activity</b>	<b>Time</b>	<b>Description</b>
10/2/2021	Cimone Nunley	Draft/ Revise	0.7	Prepare exhibits for opposition to Defendant Tesla, Inc.'s motion for judgment as a matter of law
10/2/2021	Cimone Nunley	Meet	0.7	Meet to discuss closing powerpoint slides with Navruz Avloni and Susan Organ
10/2/2021	Cimone Nunley	Meet	0.3	Meet with Larry Organ to discuss Defendant Tesla, Inc.'s motion for judgement as a matter of law
10/3/2021	Cimone Nunley	Draft/ Revise	1.4	Finalized opposition to Defendant Tesla, Inc.'s motion for judgment as a matter of law based on feedback from Larry Organ
10/3/2021	Cimone Nunley	File/ Serve	0.2	File opposition to Defendant Tesla, Inc.'s motion for judgment as a matter of law
10/3/2021	Cimone Nunley	Meet	2	Meet with Larry Organ, Navruz Avloni, Sabrina Grislis, and Susan Organ to brainstorm ideas for rebuttal slides
10/3/2021	Cimone Nunley	Plan/ Prepare	1.4	Prepare for argument on Defendant Tesla, Inc.'s motion for judgment as a matter of law
10/4/2021	Cimone Nunley	Appearance/ Attend	10.7	Appear at trial, final day. Travel to and from courthouse
10/7/2021	Cimone Nunley	Meet	0.5	Meet with Bernard Alexander, Larry Organ, and Sabrina Grislis to discuss strategy regarding posttrial motions
10/7/2021	Cimone Nunley	Communication	0.9	Call with Larry Organ and Michael Rubin re post-trial motions
10/7/2021	Cimone Nunley	Communication	0.1	Phone call with Larry Organ regarding post-trial issues
10/8/2021	Cimone Nunley	Other	0.5	Pull documents and send to Michael Rubin per his request
10/8/2021	Cimone Nunley	Other	0.1	Compile list of jurors and send to Sabrina Grislis so she can locate via PeopleMap
10/8/2021	Cimone Nunley	Communication	0.2	Draft and send email to Michael Rubin attaching requested trial exhibits and briefing
10/8/2021	Cimone Nunley	Communication	0.1	Call with Larry Organ regarding judgment form
10/8/2021	Cimone Nunley	Research	0.5	Research requirements for final judgment
10/8/2021	Cimone Nunley	Review/ Analyze	0.1	Review Plaintiff's proposed judgment for typographical errors

<b>Date</b>	<b>User</b>	<b>Activity</b>	<b>Time</b>	<b>Description</b>
10/8/2021	Cimone Nunley	Communication	0.1	Email Plaintiff's proposed judgment to opposing counsel Tracey Kennedy, Patricia Jeng, and Susan Haines
10/10/2021	Cimone Nunley	Communication	0.2	Phone call with Larry Organ regarding appeal issues
10/11/2021	Cimone Nunley	Draft/ Revise	0.6	Prepare declaration shell for David Oppenheimer for our fee motion
10/11/2021	Cimone Nunley	Communication	0.1	Send declaration shell to David Oppenheimer for our fee motion
10/11/2021	Cimone Nunley	Communication	0.2	Call with Larry Organ to discuss attorney's fee motion and juror outreach attempts
10/12/2021	Cimone Nunley	Meet	1.5	Meet with Michael Rubin, Jonathan Rosenthal, Sabrina Grislis, Larry Organ, and Navruz Avloni to discuss post-trial motions and possible issues on appeal
10/13/2021	Cimone Nunley	Draft/ Revise	1	Draft motion for attorney's fees
10/18/2021	Cimone Nunley	Communication	0.6	Call with Jonathan Rosenthal to address his questions about failure to prevent jury instructions
10/19/2021	Cimone Nunley	Draft/ Revise	2.3	Draft motion for attorney's fees
10/20/2021	Cimone Nunley	Draft/ Revise	3.4	Draft motion for attorney's fees
10/21/2021	Cimone Nunley	Draft/ Revise	14.7	Draft motion for attorney's fees
10/21/2021	Cimone Nunley	Communication	0.1	Email to Michael Rubin, Bernard Alexander, and Lawrence Organ attaching draft of fee motion for review
10/22/2021	Cimone Nunley	Research	3.5	Research and review Judge Orrick's past orders regarding attorney's fees
10/24/2021	Cimone Nunley	Draft/ Revise	4.8	Draft motion for attorney's fees
10/25/2021	Cimone Nunley	Draft/ Revise	3.3	Draft motion for attorney's fees
10/26/2021	Cimone Nunley	Draft/ Revise	3.8	Draft motion for attorney's fees
10/27/2021	Cimone Nunley	Research	1.3	Research requirements and format of bill of costs
10/27/2021	Cimone Nunley	Draft/ Revise	0.6	Prepare bill of costs

<b>Date</b>	<b>User</b>	<b>Activity</b>	<b>Time</b>	<b>Description</b>
10/28/2021	Cimone Nunley	Draft/ Revise	3.1	Prepare bill of costs
10/29/2021	Cimone Nunley	Draft/ Revise	1.6	Prepare bill of costs
11/2/2021	Cimone Nunley	Draft/ Revise	3.8	Prepare affidavit in support of bill of costs
11/3/2021	Cimone Nunley	Review/ Analyze	0.2	Review court's order granting proposed stipulation regarding post-trial briefing, and confirm all deadlines correctly calendared
11/4/2021	Cimone Nunley	Draft/ Revise	0.5	Revise proposed verdict publication
11/12/2021	Cimone Nunley	Communication	0.2	Call with Larry Organ regarding contacting jurors
11/12/2021	Cimone Nunley	Research	0.7	Locate phone number for juror Malleswaran Viswanathan
11/12/2021	Cimone Nunley	Communication	0.1	Leave voicemail for juror Brianne Uyeda
11/12/2021	Cimone Nunley	Communication	0.1	Leave voicemail for juror Maninder Johar
11/12/2021	Cimone Nunley	Communication	0.1	Call with juror Darien Hall
11/16/2021	Cimone Nunley	Communication	0.3	Call with Larry Organ to discuss timing and logistics for drafting opposition to Defendant Tesla, Inc.'s consolidated post-trial motions
11/17/2021	Cimone Nunley	Draft/ Revise	4.2	Create outline for opposition to Defendant Tesla, Inc.'s consolidated post-trial motions
11/18/2021	Cimone Nunley	Communication	0.1	Call with Navruz Avloni to discuss agenda for 11/18 meeting regarding the opposition to Defendant Tesla, Inc.'s consolidated post-trial motions
11/18/2021	Cimone Nunley	Meet	1.1	Meet with Bernard Alexander, Michael Rubin, Tracy Fehr, Larry Organ, Navruz Avloni, Jonathan Rosenthal, and Natalie Khoury regarding strategy for opposing Defendant Tesla, Inc.'s consolidated post-trial motions
11/19/2021	Cimone Nunley	Meet	0.4	Meet with Tracy Fehr to discuss strategy regarding Defendant Tesla, Inc.'s consolidated post-trial motions
11/19/2021	Cimone Nunley	Draft/ Revise	4.8	Draft opposition to Defendant Tesla, Inc.'s consolidated post-trial motions

<b>Date</b>	<b>User</b>	<b>Activity</b>	<b>Time</b>	<b>Description</b>
11/20/2021	Cimone Nunley	Draft/ Revise	6.3	Draft opposition to Defendant Tesla, Inc.'s consolidated post-trial motions
11/21/2021	Cimone Nunley	Draft/ Revise	6.3	Draft opposition to Defendant Tesla, Inc.'s consolidated post-trial motions
11/22/2021	Cimone Nunley	Draft/ Revise	9.9	Draft opposition to Defendant Tesla, Inc.'s consolidated post-trial motions
11/23/2021	Cimone Nunley	Draft/ Revise	13.1	Draft opposition to Defendant Tesla, Inc.'s consolidated post-trial motions
11/24/2021	Cimone Nunley	Meet	0.8	Meet with Bernard Alexander, Larry Organ, Navruz Avloni, Michael Rubin, Jonathan Rosenthal, and Sabrina Grislis regarding opposition to Defendant Tesla, Inc.'s consolidated post trial motion
11/24/2021	Cimone Nunley	Draft/ Revise	3.5	Draft opposition to Defendant Tesla, Inc.'s consolidated post-trial motions
11/24/2021	Cimone Nunley	Draft/ Revise	4.1	Draft opposition to Defendant Tesla, Inc.'s consolidated post-trial motions
11/25/2021	Cimone Nunley	Draft/ Revise	3.9	Draft opposition to Defendant Tesla, Inc.'s consolidated post-trial motions
11/26/2021	Cimone Nunley	Draft/ Revise	12.1	Draft opposition to Defendant Tesla, Inc.'s consolidated post-trial motions
11/27/2021	Cimone Nunley	Draft/ Revise	6.5	Draft opposition to Defendant Tesla, Inc.'s consolidated post-trial motions
11/27/2021	Cimone Nunley	Meet	1.3	Meet with Michael Rubin, Larry Organ, and Bernard Alexander regarding Plaintiff's opposition to Defendant Tesla, Inc.'s consolidated post-trial motions
11/29/2021	Cimone Nunley	Draft/ Revise	5.4	Draft opposition to Defendant Tesla, Inc.'s consolidated post-trial motions
11/30/2021	Cimone Nunley	Draft/ Revise	8.1	Draft opposition to Defendant Tesla, Inc.'s consolidated post-trial motions
12/1/2021	Cimone Nunley	Draft/ Revise	14.4	Prepare revised draft of opposition to Defendant Tesla, Inc.'s consolidated post-trial motions
12/2/2021	Cimone Nunley	Draft/ Revise	2	Prepare analysis of cases contained in Defendant Tesla, Inc.'s appendices to its consolidated post-trial motion, and send via email to Michael Rubin and Jonathan Rosenthal for inclusion in Plaintiff Owen Diaz's opposition to the same

<b>Date</b>	<b>User</b>	<b>Activity</b>	<b>Time</b>	<b>Description</b>
12/5/2021	Cimone Nunley	Research	0.5	Research third-party beneficiary holdings in Section 1981 cases for opposition to Defendant Tesla, Inc.'s consolidated post-trial motions
12/5/2021	Cimone Nunley	Research	0.8	Research California and 9th Circuit verdicts in Section 1981 harassment cases for opposition to Defendant Tesla, Inc.'s consolidated post-trial motions
12/7/2021	Cimone Nunley	Communication	0.1	Call with Larry Organ regarding out-of-circuit damages verdicts in Section 1981 cases for opposition to Defendant Tesla, Inc.'s consolidated post-trial motions
12/7/2021	Cimone Nunley	Research	4	Research damages verdicts for out-of-circuit Section 1981 racial harassment cases for opposition to Defendant Tesla, Inc.'s consolidated post-trial motions
12/22/2021	Cimone Nunley	Review/ Analyze	0.7	Review Defendant Tesla, Inc.'s reply to Plaintiff Owen Diaz's opposition to Defendant Tesla, Inc.'s consolidated post-trial motions
1/13/2022	Cimone Nunley	Communication	0.1	Review and respond to email from Michael Rubin requesting trial exhibits for oral argument on Defendant Tesla, Inc.'s consolidated post-trial motions
1/13/2022	Cimone Nunley	Plan/ Prepare	2	Review briefing and case law regarding Defendant Tesla, Inc.'s consolidated post-trial motion in preparation for 1/14/22 practice session for oral argument
1/14/2022	Cimone Nunley	Meet	1.5	Meet with Michael Rubin, Bernard Alexander, Larry Organ, Sabrina Grislis, and Jonathan Rosenthal to discuss upcoming oral argument for Defendant Tesla, Inc.'s consolidated post-trial motions
1/19/2022	Cimone Nunley	Communication	0.3	Call with Emily Kohlheim regarding hearing on Defendant Tesla, Inc.'s consolidated post-trial motions
1/19/2022	Cimone Nunley	Appearance/ Attend	2.1	Attend hearing on Defendant Tesla, Inc.'s consolidated post trial motions

Date	User	Activity	Time	Description
1/19/2022	Cimone Nunley	Communication	0.4	Call with Larry Organ and Bernard Alexander to discuss hearing on Defendant Tesla, Inc.'s consolidated post-trial motions and motion for attorney's fees
1/20/2022	Cimone Nunley	Draft/ Revise	2.9	Draft motion for attorney's fees
1/21/2022	Cimone Nunley	Review/ Analyze	1.2	Review time entries
1/21/2022	Cimone Nunley	Draft/ Revise	5.8	Draft motion for attorney's fees
1/24/2022	Cimone Nunley	Draft/ Revise	4.2	Draft motion for attorney's fees
1/25/2022	Cimone Nunley	Draft/ Revise	4.9	Draft motion for attorney's fees
1/26/2022	Cimone Nunley	Draft/ Revise	4.5	Draft motion for attorneys fees
1/31/2022	Cimone Nunley	Other	2.9	Review and revise time entries
4/19/2022	Cimone Nunley	Meet	0.8	Meet with Larry ORgan, Bernard Alexander, Jonathan Rosenthal, and Michael Rubin re potential appeal of remittitur order
6/13/2022	Cimone Nunley	Meet	0.4	Meet with Larry Organ, Bernard Alexander, Michael Rubin, and Jonathan Rosenthal to discuss Orrick's denial of motion for certification to appeal and remittitur
6/17/2022	Cimone Nunley	Meet	0.8	Meet with client, Michael Rubin, Larry ORgan, Bernard Alexander, and Sabrina Grislis re decision to reject remittitur
6/17/2022	Cimone Nunley	Draft/ Revise	0.2	Draft proposed notice of rejection of remittitur and send to Larry Organ, Michael Rubin, and Bernard Alexander for review
6/21/2022	Cimone Nunley	File/ Serve	0.2	File notice of rejection of remittitur
7/12/2022	Cimone Nunley	Appearance/ Attend	0.4	Attend hearing regarding setting new trial date
1/4/2023	Cimone Nunley	Meet	1.3	Team meeting regarding evidence strategy for retrial
1/5/2023	Cimone Nunley	Meet	1.5	meeting regarding scope of retrial and case management statement for upcoming case management conference

Date	User	Activity	Time	Description
1/9/2023	Cimone Nunley	Review/ Analyze	4.5	review transcripts and trial record to prepare for drafting motions in limine
1/9/2023	Cimone Nunley	Meet	0.3	meet with trial team to prepare for meeting with tesla's counsel
1/9/2023	Cimone Nunley	Meet	0.5	Meet with opposing counsel for tesla, inc re joint case management conference statement
1/9/2023	Cimone Nunley	Meet	0.4	Meet with trial team to discuss joint case management conference statement
1/10/2023	Cimone Nunley	Draft/ Revise	4.9	draft motions in limine
1/12/2023	Cimone Nunley	Draft/ Revise	5.9	draft MILs
1/17/2023	Cimone Nunley	Draft/ Revise	2.9	research and draft MILs
1/17/2023	Cimone Nunley	Appearance/ Attend	0.4	attend Jan 17, 2023 case management conference
1/17/2023	Cimone Nunley	Communication	0.8	Call with Bernard Alexander, Michael Rubin, and Larry Organ re strategy for motions in limine and other pretrial matters
1/19/2023	Cimone Nunley	Meet	0.5	Meet with Michael Rubin, Larry Organ, Bernard Alexander, and Marqui Hood re motions in limine
1/20/2023	Cimone Nunley	Draft/ Revise	9.5	Draft MILs.
1/26/2023	Cimone Nunley	Communication	0.4	discuss motions in limine with Larry Organ
2/2/2023	Cimone Nunley	Review/ Analyze	3.6	Review Defendant Tesla, Inc.'s deposition designations, jury instructions, witness list, and exhibit list; prepare annotated versions noting the differences between their submissions and ours
2/2/2023	Cimone Nunley	Communication	0.1	Send annotated jury instructions, witness list, exhibit list, and deposition designations to Michael Rubin, Larry Organ, Bernard Alexander, and Jonathan Rosenthal via email
2/2/2023	Cimone Nunley	Meet	1.6	Meet and confer with counsel for tesla, inc re pretrial exchange documents
2/9/2023	Cimone Nunley	Draft/ Revise	2.7	Prepare memo regarding Tesla's cited cases supporting its nominal damages instruction

Date	User	Activity	Time	Description
2/10/2023	Cimone Nunley	Draft/ Revise	2.7	Revise oppositions to Tesla's motions in limine and add citations to the record
2/10/2023	Cimone Nunley	Review/ Analyze	1.3	Finalize oppositions to Tesla's motions in limine for filing
2/14/2023	Cimone Nunley	Meet	4.7	Trial team meeting with Larry Organ, Michael Rubin, Bernard Alexander, Jonathan Rosenthal, Dustin Collier, Marqui Hood, and Elizabeth Malay
2/15/2023	Cimone Nunley	Meet	0.8	meet and confer with opposing counsel quinn emmanuel re stipulations
2/17/2023	Cimone Nunley	Meet	2.6	focus group
2/17/2023	Cimone Nunley	Meet	0.7	Meet with Dustin Collier, Bernard Alexander, Marqui Hood, Sabrina Grislis, and Larry Organ to discuss witness assignments and evidence
2/22/2023	Cimone Nunley	Meet	0.5	meet and confer with opposing counsel for Tesla, Inc. re whether the jury on retrial should be informed of the first jury's findings
2/22/2023	Cimone Nunley	Meet	0.4	Meet with Bernard Alexander, Michael Rubin, Larry Organ, Dustin Collier, and Marqui Hood to discuss Tesla's argument re not telling the retrial jury about the first jury trial
2/22/2023	Cimone Nunley	Research	0.2	Review caselaw provided by Tesla re whether retrial jury should be informed of previous jury findings; annotate and circulate to team
2/22/2023	Cimone Nunley	Meet	0.1	call with Marqui Hood and Molly Durkin re brief re whether retrial jury should be informed of first jury finding
2/22/2023	Cimone Nunley	Research	0.8	Research whether it is appropriate to inform a jury on retrial of the existence of a prior jury verdict vs unspecified determination
2/24/2023	Cimone Nunley	Meet	0.5	meet re pretrial conference on 2/27
2/24/2023	Cimone Nunley	Communication	0.1	email to Judge Orrick's courtroom deputy, Jean Davis, to inquire whether pretrial conference will be held via Zoom or in person
2/24/2023	Cimone Nunley	Review/ Analyze	0.4	Review briefing re not telling retrial jury about first trial, send back to Marqui Hood with edits
2/26/2023	Cimone Nunley	Appearance/ Attend	3.7	attend focus group



Date	User	Activity	Time	Description
2/27/2023	Cimone Nunley	Appearance/ Attend	3.9	attend pretrial conference; travel to/from
2/27/2023	Cimone Nunley	Research	0.8	Research cases cited by Tesla to support argument that nominal punitive damages instruction is appropriate; prepare summary of cases and circulate to team
2/28/2023	Cimone Nunley	Communication	0.4	meet with dustin collier and larry organ regarding 3/2 focus group and witnesses
2/28/2023	Cimone Nunley	Communication	0.1	call with cameron hartquist re results of 2/26 focus group
2/28/2023	Cimone Nunley	Communication	0.1	call with sabrina grislis regarding surveys for 3/2 focus group
3/2/2023	Cimone Nunley	Communication	0.2	Call with Molly Durkin and Marqui Hood re briefing on Wheeler cart incident
3/2/2023	Cimone Nunley	Other	0.4	Pull excerpts from 2/27 pretrial conference notes, Wheeler depo, Owen Diaz depo, and trial transcript regarding incident with feces in Wheeler's cart; send to Molly Durkin and Marqui Hood
3/2/2023	Cimone Nunley	Meet	2.8	meet with trial team to discuss themes
3/2/2023	Cimone Nunley	Plan/ Prepare	2.7	Prepare Wayne Jackson direct examination
3/2/2023	Cimone Nunley	Review/ Analyze	0.1	Review focus group script and call Dustin Collier with feedback
3/2/2023	Cimone Nunley	Appearance/ Attend	2.8	Attend focus group re defense themes
3/3/2023	Cimone Nunley	Review/ Analyze	0.2	Review response to Tesla's proposed jury instructions and provide feedback to Jonathan Rosenthal
3/4/2023	Cimone Nunley	Appearance/ Attend	4.7	attend focus group
3/8/2023	Cimone Nunley	Meet	1	trial team meeting
3/13/2023	Cimone Nunley	Appearance/ Attend	2.7	attend theme focus group
3/15/2023	Cimone Nunley	Draft/ Revise	3.2	Prepare Quintero direct examination
3/16/2023	Cimone Nunley	Draft/ Revise	2.1	Prepare Quintero direct examination

<b>Date</b>	<b>User</b>	<b>Activity</b>	<b>Time</b>	<b>Description</b>
3/16/2023	Cimone Nunley	Draft/ Revise	2.1	Revise Quintero examination script based on feedback from Larry Organ
3/22/2023	Cimone Nunley	Research	1.9	research potential jurors
3/22/2023	Cimone Nunley	Meet	1.7	Discuss juror panel with trial team
3/22/2023	Cimone Nunley	Meet	3.9	Meet with trial team to discuss demonstratives
3/24/2023	Cimone Nunley	Review/ Analyze	0.1	Review file to locate expert report of Amy Oppenheimer
3/24/2023	Cimone Nunley	File/ Serve	0.3	File expert report of Amy Oppenheimer for Court's review
3/24/2023	Cimone Nunley	Plan/ Prepare	4.9	Prepare LaDrea Jones examination
3/25/2023	Cimone Nunley	Plan/ Prepare	1.6	Prepare La'Drea Jones examination
3/25/2023	Cimone Nunley	Review/ Analyze	1.1	Review email from Tesla counsel Asher Griffin and review challenged or missing designations identified in email
3/25/2023	Cimone Nunley	Communication	0.2	draft email to Tesla counsel Asher Griffin re missing and challenged designations; send to Larry Organ for review
3/25/2023	Cimone Nunley	Plan/ Prepare	1.5	Prepare with witness La'Drea Jones
3/25/2023	Cimone Nunley	Appearance/ Attend	2.4	Attend focus group re opening statements
3/25/2023	Cimone Nunley	Meet	1.8	Meet to discuss focus group results
3/25/2023	Cimone Nunley	Plan/ Prepare	0.3	Review and revise script for focus group re opening statements
3/25/2023	Cimone Nunley	Review/ Analyze	0.1	Review focus group demographic survey responses for 3/25 focus group re opening statements
3/26/2023	Cimone Nunley	Research	2.1	Research Batson issues
3/26/2023	Cimone Nunley	Plan/ Prepare	1.8	Prepare Delgado-Smith examination
3/26/2023	Cimone Nunley	Meet	2.5	Meet for opening statement practice/discussion
3/26/2023	Cimone Nunley	Review/ Analyze	0.8	Review Owen Diaz direct examination and return to Marqui Hood with comments

Date	User	Activity	Time	Description
3/26/2023	Cimone Nunley	Research	1.4	Research Batson issues
3/27/2023	Cimone Nunley	Appearance/ Attend	11.7	Attend first day of trial; travel time to/from
3/27/2023	Cimone Nunley	Meet	1.6	trial team meeting
3/27/2023	Cimone Nunley	File/ Serve	0.2	File objections to Tesla's opening statement
3/28/2023	Cimone Nunley	Appearance/ Attend	8.7	Attend day 2 of trial, travel time to/from
3/28/2023	Cimone Nunley	Meet	3.8	Meet with trial team re closing slides
3/28/2023	Cimone Nunley	Review/ Analyze	1.5	compare draft final jury instructions to first trial jury instructions
3/29/2023	Cimone Nunley	Communication	0.5	call with larry organ re Tesla's brief on exh. 410
3/29/2023	Cimone Nunley	Draft/ Revise	2.1	prepare response to tesla brief re exh 420
3/29/2023	Cimone Nunley	Draft/ Revise	2.1	Draft objection to Tesla trial brief re exhibit 410
3/29/2023	Cimone Nunley	File/ Serve	0.3	Prepare and file revised jury instruction no. 32
3/29/2023	Cimone Nunley	Appearance/ Attend	8	Attend day 3 of trial
3/29/2023	Cimone Nunley	Meet	3.2	Meet with trial team re closing, themes
3/30/2023	Cimone Nunley	Appearance/ Attend	8	Attend Day 4 of trial, travel time to/from
3/30/2023	Cimone Nunley	Draft/ Revise	1	Revise brief re inflammatory and prejudicial testimony re navarro and joyce delagrande
3/31/2023	Cimone Nunley	Draft/ Revise	8.4	Draft motion for mistrial
3/31/2023	Cimone Nunley	File/ Serve	0.3	File objections to Navarro/DeLaGrande testimony and motion for mistrial
3/31/2023	Cimone Nunley	Appearance/ Attend	13.6	Attend 5th day of trial, travel to/from
4/3/2023	Cimone Nunley	Appearance/ Attend	10.7	attend day 6 of trial, travel to/from
4/5/2023	Cimone Nunley	Meet	0.8	Meet with trial team to discuss post-trial work

Date	User	Activity	Time	Description
4/7/2023	Cimone Nunley	Research	2.3	Research Judge Orrick's past fee orders for fee motion
4/13/2023	Cimone Nunley	Draft/ Revise	0.3	Revised proposed stipulation to extend time to file attorneys' fees based on edits from Dustin Collier, Michael Rubin, and Jonathan Rosenthal; send to the same for review
4/14/2023	Cimone Nunley	Draft/ Revise	0.1	Revised proposed stipulation re filing of attorney's fee motion
4/14/2023	Cimone Nunley	Communication	0.1	Send revised stipulation extending time to file attorneys' fee motion to Tesla counsel Dan Posner
4/14/2023	Cimone Nunley	Meet	0.7	Meet with Dustin Collier, Michael Rubin, Marqui Hood, and Larry Organ to discuss fee motion
4/17/2023	Cimone Nunley	Draft/ Revise	0.1	Finalize stipulation re extension of time to file attorney's fees
4/17/2023	Cimone Nunley	File/ Serve	0.1	File stipulation and proposed order extending time to file motion for attorney's fees; send Word version to Judge Orrick's staff
4/17/2023	Cimone Nunley	Other	0.2	Prepare mileage reimbursement request for trial and submit to Kris Organ and Julianne Stanford for approval
4/19/2023	Cimone Nunley	Research	0.7	Research and review past decisions re Quinn Emmanuel's billing rates
4/19/2023	Cimone Nunley	Research	1.4	Review Judge Orrick's past fee decisions to prepare for drafting attorney's fees motion
4/24/2023	Cimone Nunley	Communication	0.1	Send follow-up email to Tesla counsel Asher Griffin, Mari Henderson, and Dan Posner to follow up on stipulation extending time for post-trial briefing; send email to Jonathan Rosenthal informing him of the same
4/24/2023	Cimone Nunley	Review/ Analyze	1	Review all invoices incurred in case since date of first trial
4/24/2023	Cimone Nunley	Research	0.8	Research which costs are allowed under federal and local rules for inclusion in bill of costs
4/24/2023	Cimone Nunley	Draft/ Revise	0.6	Revise bill of costs to include updated costs since date of first trial
4/24/2023	Cimone Nunley	Draft/ Revise	0.9	Revise declaration to accompany bill of costs to include new costs incurred since first trial

Date	User	Activity	Time	Description
4/24/2023	Cimone Nunley	Communication	0.1	Email Jonathan Rosenthal copy of stipulation to extend time to file post-trial motions from first trial
4/25/2023	Cimone Nunley	Draft/ Revise	0.2	Update bill of costs with additional costs provided by Larry Organ and Sabrina Grislis
4/25/2023	Cimone Nunley	Plan/ Prepare	0.2	Combine and finalize exhibits to bill of costs for filing
4/25/2023	Cimone Nunley	Draft/ Revise	0.1	Review, finalize, and check math on bill of costs and supporting declaration
4/25/2023	Cimone Nunley	Plan/ Prepare	0.1	Convert bill of costs and supporting declaration to .pdf for filing
4/25/2023	Cimone Nunley	File/ Serve	0.1	File Bill of Costs and supporting affidavit
4/25/2023	Cimone Nunley	Review/ Analyze	0.1	Review Judge Orrick's standing order to determine whether we need to send courtesy paper copies of bill of costs to chambers.
4/25/2023	Cimone Nunley	Research	2.3	Research for cases regarding relatedness under Hensley v. Eckhart and Farrar v. Hobby
4/25/2023	Cimone Nunley	Draft/ Revise	6.1	Draft motion for attorneys' fees
4/26/2023	Cimone Nunley	Research	0.5	Research fee-shifting multiplier cases in the 9th Circuit
4/26/2023	Cimone Nunley	Draft/ Revise	4.2	Draft motion for attorney's fees
4/26/2023	Cimone Nunley	Draft/ Revise	0.9	Review motion for attorneys' fees and add cites to record
4/28/2023	Cimone Nunley	Review/ Analyze	0.2	Review emails to determine whether Plaintiff or Tesla proposed increased 35 page limit for post-trial motions after first trial.
4/28/2023	Cimone Nunley	Communication	0.1	Email to Tesla counsel Dan Posner agreeing to proposed post-trial briefing schedule and requesting Tesla reconsider stipulating to increased page limit
4/28/2023	Cimone Nunley	Draft/ Revise	0.3	Prepare stipulation regarding post-trial motion briefing schedule; send to Michael Rubin and Jonathan Rosenthal for review
5/2/2023	Cimone Nunley	Review/ Analyze	2	Review Rule 59 motion drafted by Jonathan Rosenthal
5/2/2023	Cimone Nunley	Communication	0.6	Call with Larry Organ re juror declarations

Date	User	Activity	Time	Description
5/2/2023	Cimone Nunley	Research	1.9	Research juror misconduct issue
5/4/2023	Cimone Nunley	Review/ Analyze	3.6	Review new trial motion prepared by Jonathan Rosenthal
5/8/2023	Cimone Nunley	Communication	0.1	Call with Larry Organ re Tesla's objections to bill of costs
5/8/2023	Cimone Nunley	Communication	0.1	Email to Larry Organ, Bernard Alexander, Michael Rubin, Jonathan Rosenthal, Michael Rubin, Corrine Johnson, Marqui Hood, and Dustin Collier regarding upcoming 5/9 call with Tesla counsel Dan Posner about Tesla's proposed objections to Plaintiff's bill of costs
5/9/2023	Cimone Nunley	Communication	0.2	Call with Tesla counsel Dan Posner and Alex Bergman re Tesla's objections to Plaintiff's bill of costs
5/9/2023	Cimone Nunley	Review/ Analyze	1.1	Review new trial motion and send feedback to Jonathan Rosenthal and Corrine Johnson
5/10/2023	Cimone Nunley	Review/ Analyze	0.3	Review Tesla's new trial motion
5/24/2023	Cimone Nunley	Review/ Analyze	4.8	Review and revise time records
6/5/2023	Cimone Nunley	Review/ Analyze	2.1	Review reply to Tesla's Rule 59 motion prepared by Jonathan Rosenthal and Corrine Johnson; send via email with comments
6/7/2023	Cimone Nunley	Review/ Analyze	0.4	Review opposition to Tesla's Rule 59 motion and send comments to Jonathan Rosenthal and Corrine Johnson
6/14/2023	Cimone Nunley	Review/ Analyze	0.2	Review memo prepared by Michael Rubin re our reply to Tesla's opposition to our motion for new trial
6/14/2023	Cimone Nunley	Review/ Analyze	0.9	Review Tesla's opposition to our motion for new trial
6/14/2023	Cimone Nunley	Meet	1.2	Meet with Michael Rubin, Corrine Johnson, and Larry Organ to discuss strategy re our reply to Tesla's opposition to our motion for new trial
6/20/2023	Cimone Nunley	Review/ Analyze	0.3	Review transcripts and docket for rulings regarding admissibility of Exhibit 410; send to Corrine Johnson

Date	User	Activity	Time	Description
6/20/2023	Cimone Nunley	Review/ Analyze	5.1	Review Tesla opposition to new trial motion and compile review of factual assertions for Corrine Johnson
6/22/2023	Cimone Nunley	Review/ Analyze	2.6	Review Tesla opposition to our new trial motion for factual inaccuracies and send notes to Corrine Johnson
6/28/2023	Cimone Nunley	Review/ Analyze	2.7	Review reply for our new trial motion and send feedback to Corrine Johnson
7/10/2023	Cimone Nunley	Communication	0.1	Email Dustin Collier, Bernard Alexander, Michael Rubin, Jonathan Rosenthal, Corrine Johnson, and Larry Organ to request supporting fee declarations, time records, and fee declarations
7/10/2023	Cimone Nunley	Review/ Analyze	4.1	Review and revise California Civil Rights Law Group time records
7/12/2023	Cimone Nunley	Review/ Analyze	5.3	Review and revise time records
7/19/2023	Cimone Nunley	Draft/ Revise	0.2	Prepare case management statement for 8/15/23 state court case management conference; send to Sabrina Grislis with instructions for filing and service
7/20/2023	Cimone Nunley	Draft/ Revise	0.3	Revise Whelan dec shell based on request from Larry Organ
7/20/2023	Cimone Nunley	Review/ Analyze	3.9	Review and revise time records
7/21/2023	Cimone Nunley	Review/ Analyze	5.4	Review and revise billing records
7/25/2023	Cimone Nunley	Review/ Analyze	3.2	Review and revise time records
7/26/2023	Cimone Nunley	Communication	0.1	Send Larry Organ a copy of Michael Rubin's most recent draft fee declaration
8/4/2023	Cimone Nunley	Draft/ Revise	4.1	Draft supplemental brief re Tesla's failure to produce evidence of restroom graffiti
8/4/2023	Cimone Nunley	Communication	0.2	Call with Larry Organ and Michael Rubin re newly-discovered evidence of bathroom graffiti in 2016
8/8/2023	Cimone Nunley	Communication	0.1	Call with Michael Rubin re notice of new evidence in support of mistrial motion
8/8/2023	Cimone Nunley	Draft/ Revise	0.3	Revise notice of new evidence and accompanying declaration

Date	User	Activity	Time	Description
8/8/2023	Cimone Nunley	Draft/ Revise	0.1	Prepare exhibits to accompany notice of new evidence in support of motion for mistrial; send exhibits and notice of new evidence to Michael Rubin for review
8/8/2023	Cimone Nunley	Draft/ Revise	0.1	Finalize notice of new evidence for filing
8/8/2023	Cimone Nunley	Communication	0.2	Send notice of new evidence and declaration to Sabrina Grislis with instructions for filing
10/4/2023	Cimone Nunley	Meet	1.2	Call with Michael Rubin, Sabrina Grislis, Corrine Johnson, Larry Organ, Dustin Collier, Marqui Hood, and Bernard Alexander regarding potential appeal of motion denying new trial
10/5/2023	Cimone Nunley	Communication	0.1	Call with Michael Rubin re fee motion
10/5/2023	Cimone Nunley	Review/ Analyze	0.2	Review David DiRubertis declaration
10/5/2023	Cimone Nunley	Communication	0.1	Email to Bernard Alexander, Larry Organ, Jonathan Rosenthal, and Michael Rubin re DiRubertis declaration
10/5/2023	Cimone Nunley	Draft/ Revise	1.5	Revise motion for attorneys' fees
10/5/2023	Cimone Nunley	Draft/ Revise	2.1	Prepare objection to Tesla's request for judicial notice
10/6/2023	Cimone Nunley	Research	1.3	Research Quinn Emmanuel and Sheppard Mullin's hourly rates
10/6/2023	Cimone Nunley	Communication	0.1	Email to Bernard Alexander providing summary of witnesses he examined during retrial
10/6/2023	Cimone Nunley	Review/ Analyze	0.2	Review case file and send email to Michael Rubin, Dustin Collier, and Bernard Alexander requesting their time records and fee declarations
10/8/2023	Cimone Nunley	Review/ Analyze	1.9	Review and revise time records



Date	User	Activity	Time	Description
9/21/2017	Larry Organ	Communication	5.8	Meet with Owen in Oakland office, travel to and from San Anselmo
2/27/2018	Larry Organ	Communication	0.3	Meet with Navruz Avloni regarding the Case Management Conference, General Order no. 71 per the Judge's orders; determine scope of discovery.
2/27/2018	Larry Organ	Appearance/ Attend	2.7	Appear at the Case Management Conference before Judge Orrick, travel to and from courthouse.
3/18/2018	Larry Organ	Communication	3.5	Meet with Owen Diaz in Oakland, travel to and from
4/4/2018	Larry Organ	Deposition	0.1	Review deposition Notice for Demetric Di-az
4/9/2018	Larry Organ	Plan/ Prepare	1	Prepare for deposition of Demetric Di-az
4/27/2018	Larry Organ	Meet	0.3	Meet with Cimone Nunley regarding discovery issues and strategy
4/30/2018	Larry Organ	Draft/ Revise	1.1	Revise Requests for Production of Documents and Special Interrogatories
5/1/2018	Larry Organ	Draft/ Revise	0.4	Revise the deposition notice of Defendant Tesla's person most knowledgeable.
5/1/2018	Larry Organ	Meet	0.2	Meet with Navruz Avloni regarding Defendant Tesla's person most knowledgeable deposition notice
5/1/2018	Larry Organ	Draft/ Revise	0.2	Draft additional discovery requests and further edit the deposition notice of Defendant Tesla's person most knowledgeable.
5/2/2018	Larry Organ	Meet	0.2	Meet with Navruz Avloni and Cimone Nunley regarding settlement issues
5/10/2018	Larry Organ	Plan/ Prepare	2.7	Prepare Owen Diaz for deposition
5/10/2018	Larry Organ	Communication	0.3	Meet with Navruz Avloni regarding deposition preparation of client Owen Diaz
5/15/2018	Larry Organ	Appearance/ Attend	10.5	Appear for the deposition of Demetric Diaz taken by Barbara Antonucci for 5.0 hours of recorded testimony. Spend time with client in relating to deposition. Travel to and from deposition.
5/17/2018	Larry Organ	Meet	2.4	Meet with Owen to prepare him for his deposition - also present Navruz Avloni
5/20/2018	Larry Organ	Meet	0.1	Meet with Navruz Avloni to discuss deposition of Owen Diaz
5/20/2018	Larry Organ	Communication	0.1	Discussion with Navruz Avloni regarding settlement numbers
5/20/2018	Larry Organ	Communication	0.1	Discussion with Navruz Avloni regarding new documents served by Defendants Tesla and Citistaff
5/20/2018	Larry Organ	Communication	0.1	Communication with Navruz Avloni regarding mediation strategy
5/21/2018	Larry Organ	Communication	0.2	Telephone conference with Navruz Avloni regarding Owen Diaz's Deposition

Date	User	Activity	Time	Description
5/22/2018	Larry Organ	Appearance/ Attend	9.8	Appear for deposition of Owen Diaz with Navruz Avloni and travel to and from San Francisco
6/1/2018	Larry Organ	Meet	0.3	Meet with Navruz Avloni to discuss the person most knowledgeable topics for Defendant Tesla.
6/1/2018	Larry Organ	Communication	0.3	Telephone conference with counsel for Tesla Barbara Antonucci and Naruz Avloni regarding people Tesla will produce for person most knowledgeable deposition; we will follow up with email.
6/1/2018	Larry Organ	Communication	0.1	Discussion with Navruz Avloni regarding mediation brief
6/4/2018	Larry Organ	Communication	0.2	Telephone conference with Navruz Avloni regarding mediation privilege and strategy
6/4/2018	Larry Organ	Meet	0.3	Meet with Navruz Avloni regarding mediation issues and strategy
6/4/2018	Larry Organ	Review/ Analyze	0.2	Review West Valley Staffing Responses to Special Interrogatories
6/4/2018	Larry Organ	Draft/ Revise	2.9	Review documents for mediation and edit mediation brief
6/5/2018	Larry Organ	Appearance/ Attend	7.3	Attend the deposition of Rovilla Wetle (Started by Navruz Avloni). Review documents on break; meet with Navruz Avloni regarding questions. Finished the remainder of the deposition.
6/6/2018	Larry Organ	Communication	0.4	Discussion with Navruz Avloni regarding tomorrow's depositions Javier Caballero and Victor Quintero
6/6/2018	Larry Organ	Communication	0.1	Email to Opposing Counsel clarifying depositions for tomorrow will include only 2 witnesses: Javier Caballero and Victor Quintero
6/6/2018	Larry Organ	Communication	0.1	Response from Aaron Langberg, counsel for nextSource, confirming depositions for tomorrow
6/6/2018	Larry Organ	Plan/ Prepare	5.5	Plan for depositions of Victor Quintero and Javier Caballero
6/7/2018	Larry Organ	Plan/ Prepare	2.3	Plan and prepare for Victor Quintero deposition
6/7/2018	Larry Organ	Appearance/ Attend	7.9	Appear for depositions of Javier Caballero and Victor Quintero in San Anselmo
6/7/2018	Larry Organ	Communication	0.1	Send text to Navruz Avloni regarding depositions today
6/8/2018	Larry Organ	Communication	0.5	Meet with Cimone Nunley, Noah Baron and Ramzi Nimr to discuss the depositions of Javier Caballero and Victor Quintero.
6/11/2018	Larry Organ	Appearance/ Attend	8.4	Appear with Nav Avloni, Clients and Ramzi Nimr for mandatory settlement conference and travel to and from San Francisco
6/14/2018	Larry Organ	Communication	0.2	Discussed expert Dr. Smith and next steps with Navruz Avloni
6/15/2018	Larry Organ	Communication	0.1	Discussion of confidential designations with Navruz Avloni
6/17/2018	Larry Organ	Communication	0.1	Email to opposing counsels regarding deposition designations

Date	User	Activity	Time	Description
6/18/2018	Larry Organ	Communication	0.1	Email from opposing counsel regarding deposition designations
7/11/2018	Larry Organ	Communication	0.2	Conference with Ramzi Nimr regarding soundbites
9/4/2018	Larry Organ	Communication	0.1	Meet with Cimone Nunley and Navruz Avloni regarding settlement and amendment issues
9/4/2018	Larry Organ	Communication	0.1	Telephone conference with Navruz Avloni and Barbara Antonucci, counsel for Defendants Tesla and Citistaff, regarding mediation prior to the Case Management Conference.
9/4/2018	Larry Organ	Appearance/ Attend	0.3	Court Call Appearance at 2:00 PM for Case Management Conference. Judge Orrick who informed us of a likely delay in trial due to criminal trial; he offered to transfer case to Magistrate or other judge.
9/7/2018	Larry Organ	Meet	0.3	Meet with Cimone Nunley and Navruz Avloni regarding the list of individuals to depose in this case
10/8/2018	Larry Organ	Communication	0.1	Discussion with Navruz Avloni regarding mediation brief
10/9/2018	Larry Organ	Draft/ Revise	1	Revise Mediation Statement
10/9/2018	Larry Organ	Meet	0.1	Meet with Navruz Avloni regarding edits to mediation brief.
10/15/2018	Larry Organ	Plan/ Prepare	2.9	Prepare for mediation by reviewing papers and evidence.
10/16/2018	Larry Organ	Appearance/ Attend	8.5	Appear for mediation with Jeff Ross -- Ramzi also attended -- We communicated offers to Mediator. No offers from Defense. travel to and from Oakland
10/16/2018	Larry Organ	Communication	0.1	Communication with Navruz Avloni regarding mediation and next steps
10/16/2018	Larry Organ	Communication	0.1	Call with Noah Baron regarding research on section 1981 and liability for failing to prevent harassment.
10/18/2018	Larry Organ	Review/ Analyze	0.4	Review Jury Verdicts found by Cimone Nunley.
10/18/2018	Larry Organ	Communication	0.1	Email to Mediator Jeff Ross regarding jury verdicts in race cases.
10/30/2018	Larry Organ	Draft/ Revise	0.2	Revise the meet and confer letters regarding the subpoenas to current employer for Owen Diaz
10/30/2018	Larry Organ	Communication	0.1	Telephone messages for Barbara Antonucci and Aaron Rutschman regarding meet and confer on Defendants Tesla's and Citistaff's subpoenas
10/30/2018	Larry Organ	Communication	0.1	Email exchange setting meet and confer for 11:00 tomorrow and send meet and confer letter
10/30/2018	Larry Organ	Communication	0.1	Meet with Noah Baron regarding my edits to the meet and confer letter regarding Defendants' subpoenas to subsequent employers.
10/30/2018	Larry Organ	Communication	0.1	Communication with Navruz Avloni regarding meet and confer requirements.

Date	User	Activity	Time	Description
10/30/2018	Larry Organ	Communication	0.1	Telephone conference with Navruz Avloni regarding discovery
10/30/2018	Larry Organ	Meet	0.1	Meet with Noah Baron to discuss meet and confer letter regarding AC Transit subpoena
10/31/2018	Larry Organ	Review/ Analyze	0.9	Review letter from Aaron Rutschman regarding discovery issues; researching regarding the discovery issues; meet with Noah Baron regarding the same.
10/31/2018	Larry Organ	Communication	0.3	Telephone conference with Counsel for Defendants Citistaff and Tesla, Aaron Rutschman, and Noah Baron regarding subpoena scope issues for Owen Diaz's current employers.
11/2/2018	Larry Organ	Plan/ Prepare	0.2	Prepare for call with counsel for Defendants Citistaff and Tesla, Aaron Rutchman, regarding Defendant's subpoenas.
11/2/2018	Larry Organ	Communication	0.3	Telephone conf. with Aaron Rutschman and Noah re discovery issues relating to subpoenas - he will reframe and send to me.
11/4/2018	Larry Organ	Review/ Analyze	0.3	Review depositions to date
11/4/2018	Larry Organ	Communication	0.1	Send email to opposing counsel regarding meeting to schedule depositions
11/9/2018	Larry Organ	Plan/ Prepare	0.4	Prepare for telephone conference by reviewing deposition notices
11/9/2018	Larry Organ	Communication	0.7	Telephone conference with opposing counsel and Cimone Nunley regarding depositions
11/9/2018	Larry Organ	Communication	0.1	Telephone conference with Navruz Avloni regarding the depositions of Defendants West Valley and Citistaff's persons most knowledgeable.
11/9/2018	Larry Organ	Draft/ Revise	0.2	Review and revise the deposition notices to Defendants West Valley and Citistaff's persons most knowledgeable.
11/9/2018	Larry Organ	Communication	0.1	Meet with Sabrina Grislis regarding service of discovery
11/9/2018	Larry Organ	Communication	0.1	Telephone conference with Navruz Avloni regarding my telephone call with opposing counsel about the West Valley and Citistaff person most knowledgeable depositions.
11/9/2018	Larry Organ	Communication	0.3	Discussion with Cimone Nunley to prepare for 2:00 pm call with opposing counsel
11/13/2018	Larry Organ	Communication	0.2	Email exchanges regarding scheduling for depositions
11/21/2018	Larry Organ	Communication	0.2	Meet with Cimone Nunley regarding additional discovery
11/26/2018	Larry Organ	Communication	0.2	Discussion with Cimone Nunley regarding discovery
11/26/2018	Larry Organ	Communication	0.1	Discuss client deposition preparation with Navruz Avloni
11/27/2018	Larry Organ	Meet	0.9	Meet with clients to prepare them for deposition
11/28/2018	Larry Organ	Communication	0.1	Email to Sabrina Grislis regarding deposition exhibit preparation

Date	User	Activity	Time	Description
11/28/2018	Larry Organ	Communication	0.1	Meet with Ramzi Nimr regarding deposition preparation
11/28/2018	Larry Organ	Communication	0.2	Meet with Cimone Nunley regarding discovery
11/28/2018	Larry Organ	Plan/ Prepare	2.5	Review exhibits for deposition
11/28/2018	Larry Organ	Plan/ Prepare	4.4	Additional preparation for deposition of Edward Romano; review documents and draft outline
11/29/2018	Larry Organ	Plan/ Prepare	0.6	Revise outline for deposition of Ed Romero
11/29/2018	Larry Organ	Communication	0.2	Telephone conference with Sabrina Grislis regarding exhibits for the deposition of Edward Romero
11/29/2018	Larry Organ	Plan/ Prepare	6.5	Prepare for deposition of Ed Romero
11/29/2018	Larry Organ	Communication	0.4	Call with Cimone Nunley regarding discovery
11/29/2018	Larry Organ	Communication	0.2	Call with Cimone Nunley regarding her call with Tamotsu Kawasaki; depositions
11/30/2018	Larry Organ	Plan/ Prepare	1.4	Prepare for deposition of Edward Romero prior to deposition
11/30/2018	Larry Organ	Appearance/ Attend	7.1	Appear for Ed Romero deposition in San Anselmo
11/30/2018	Larry Organ	Communication	0.1	Discussion with Cimone Nunley regarding Demetrica Diaz and La'Drea Jones depositions
12/2/2018	Larry Organ	Plan/ Prepare	6.7	Prepare for Owen Diaz's deposition by reviewing exhibits and new evidence; review prior deposition transcripts; make notes.
12/3/2018	Larry Organ	Appearance/ Attend	6.2	Appear for Day 2 of Owen Diaz; deposition went over time; permitted counsel for Tesla Barbara Antonucci and counsel for West Valley Fenn Horton to ask questions after time had expired; travel to and from San Francisco.
12/4/2018	Larry Organ	Communication	0.1	Telephone conference with Navruz Avloni and research regarding deposition length.
12/4/2018	Larry Organ	Meet	1.8	Case Strategy Meeting with Navruz Avloni and Cimone Nunley.
12/4/2018	Larry Organ	Research	0.1	Research information about length of depositions
12/5/2018	Larry Organ	Meet	1.5	Meet with Cimone Nunley and Navruz Avloni regarding strategy
12/5/2018	Larry Organ	Meet	0.5	Additional meeting with Navruz Avloni and Cimone Nunley regarding strategy
12/5/2018	Larry Organ	Draft/ Revise	1.5	Revise Supplemental Disclosures and review relevant documents
12/8/2018	Larry Organ	Draft/ Revise	1	Draft beginning of Opening Statement
12/10/2018	Larry Organ	Meet	0.6	Meet with Navruz Avloni, Noah Baron and Cimone Nunley to discuss strategy and whether amended complaint is needed

Date	User	Activity	Time	Description
12/10/2018	Larry Organ	Communication	0.1	Email to opposing counsel regarding the need to amend complaint and extend deadlines
12/10/2018	Larry Organ	Plan/ Prepare	3.5	Prepare for West Valley PMK deposition
12/10/2018	Larry Organ	Communication	0.1	Meet with Noah Baron regarding preparation for the West Valley PMK deposition.
12/10/2018	Larry Organ	Communication	0.1	Meet with Sabrina Grislis regarding preparation of the exhibits for tomorrow's deposition of West Valley's PMK
12/10/2018	Larry Organ	Communication	0.1	Email exchange with opposing counsel regarding the trial continuance and Defendant nextSource addition to case
12/10/2018	Larry Organ	Communication	0.1	Telephone conference with counsel for Tesla and Citistaff, Barbara Antonucci, regarding the trial continuance
12/10/2018	Larry Organ	Review/ Analyze	0.2	Review proposed joint stipulation to amend complaint and add nextSource as a Defendant
12/10/2018	Larry Organ	Meet	0.2	Meet with Navruz Avloni and Noah Baron regarding West Valley PMK Deposition prep
12/13/2018	Larry Organ	Communication	0.1	Phone call with Navruz Avloni regarding amending complaint
12/28/2018	Larry Organ	Communication	0.2	Meet with Navruz Avloni regarding discovery responses
12/28/2018	Larry Organ	Communication	0.1	Notice of Order approving substitution of counsel
12/28/2018	Larry Organ	Communication	0.1	Voice Message for Tracey Kennedy asking if she wants to agree to electronic service
1/2/2019	Larry Organ	Communication	0.5	Meet with Navruz Avloni regarding case strategy and tasks
1/2/2019	Larry Organ	Communication	0.2	Meet with Navruz Avloni regarding witness information
1/2/2019	Larry Organ	Draft/ Revise	0.7	Revise the deposition notice for Defendant Tesla's PMK.
1/2/2019	Larry Organ	Communication	0.4	Meet with Navruz Avloni to discuss strategy for meeting with Tracy Kennedy, new counsel for Defendant Tesla
1/2/2019	Larry Organ	Meet	0.3	Meet with Navruz Avloni to discuss depositions
1/3/2019	Larry Organ	Communication	0.2	Meet with Navruz Avloni prior to meeting with Tracey Kennedy, new counsel for Defendant Tesla
1/3/2019	Larry Organ	Communication	0.3	Telephone conference with Tracey Kennedy, new counsel for Defendant Tesla
1/3/2019	Larry Organ	Communication	0.1	Meet with Navruz Avloni after meeting with Tracey Kennedy
1/3/2019	Larry Organ	Communication	0.5	Telephone conference with Owen Diaz regarding Demetric Di-az
1/7/2019	Larry Organ	Communication	0.6	Further communication with Owen Diaz regarding issues in case
1/7/2019	Larry Organ	Communication	0.3	Meet with Navruz Avloni regarding strategy

Date	User	Activity	Time	Description
1/7/2019	Larry Organ	Communication	0.3	Phone call with Owen Diaz regarding case issues
1/7/2019	Larry Organ	Communication	0.1	Email to Owen Diaz
1/7/2019	Larry Organ	Draft/ Revise	0.2	Review and revise stipulations re time for defendants to answer
1/7/2019	Larry Organ	Communication	0.1	Email re stipulations re time for defendants to answer
1/7/2019	Larry Organ	Review/ Analyze	0.1	Review filed stipulation for Defendant nextSource's time to answer
1/8/2019	Larry Organ	Communication	0.1	Call with Owen Diaz regarding case
1/8/2019	Larry Organ	Review/ Analyze	0.1	Review filing regarding answer deemed acceptable
1/8/2019	Larry Organ	Communication	0.5	Further telephone conference with Owen Diaz in the evening
1/9/2019	Larry Organ	Communication	0.1	Email from Tracey Kennedy regarding dates
1/9/2019	Larry Organ	Communication	0.1	Email responses to Tracey Kennedy
1/9/2019	Larry Organ	Communication	0.1	Telephone call with Patty Jeng regarding deadlines
1/9/2019	Larry Organ	Communication	0.2	Call with client regarding case issues
1/9/2019	Larry Organ	Communication	0.2	Meet with Noah Baron and Cimone Nunley regarding case issues
1/16/2019	Larry Organ	Communication	0.1	Email from Aaron Rutschman regarding request for discovery extension
1/16/2019	Larry Organ	Communication	0.1	Email to Aaron Rutschman asking for clarification as to new attorneys
1/17/2019	Larry Organ	Communication	0.1	Email to Aaron Rutschman confirming discovery extension to February 15
1/22/2019	Larry Organ	Meet	0.1	team meeting
2/3/2019	Larry Organ	Draft/ Revise	1.3	Draft Plaintiff Owen Diaz's request for production of documents, set three to Defendant Tesla; review prior requests.
2/7/2019	Larry Organ	Communication	0.1	Telephone conference with Tracey Kennedy, counsel for Tesla, regarding potential settlement
2/7/2019	Larry Organ	Communication	0.1	Telephone conference with Owen Diaz regarding settlement
2/7/2019	Larry Organ	Communication	0.2	Discuss potential settlement of case with Navruz Avloni and Cimone Nunley
2/11/2019	Larry Organ	Communication	0.2	Telephone conference with Tracey Kennedy, counsel for Tesla, regarding global resolution
2/11/2019	Larry Organ	Draft/ Revise	2.8	Review documents produced in case and draft additional request for production of documents set four and rogs set 2 to Tesla



Date	User	Activity	Time	Description
2/11/2019	Larry Organ	Communication	0.1	Email to Sabrina Grislis regarding discovery to serve tomorrow
2/11/2019	Larry Organ	Communication	0.1	Email to Cimone Nunley regarding meet and confer on Tesla's Request for Production, set one.
2/11/2019	Larry Organ	Communication	0.1	Email to Navruz Avloni regarding discovery in Diaz
2/12/2019	Larry Organ	Communication	0.2	Discussion with Navruz Avloni regarding confidential topics
2/12/2019	Larry Organ	Communication	0.1	Discussion with Navruz Avloni regarding scheduling
2/28/2019	Larry Organ	Draft/ Revise	1.1	Revise meet and confer letter
2/28/2019	Larry Organ	Communication	0.1	Discussion with Navruz Avloni regarding West Valley discovery responses
3/13/2019	Larry Organ	Communication	0.1	Discussion with Cimone Nunley regarding additional discovery
3/13/2019	Larry Organ	Communication	0.3	Discussion with Cimone Nunley regarding depositions, discovery
3/29/2019	Larry Organ	Meet	1	Meet with Navruz Avloni and Cimone Nunley regarding discovery issues and strategy
4/1/2019	Larry Organ	Communication	0.1	Telephone conference with Navruz Avloni regarding Tesla PMK deposition
5/16/2019	Larry Organ	Plan/ Prepare	2.5	Prepare for deposition of Wayne Jackson
5/17/2019	Larry Organ	Plan/ Prepare	0.9	Prepare for deposition of Wayne Jackson prior to depo
5/17/2019	Larry Organ	Deposition	5.4	Deposition of Wayne Jackson and travel to and from Oakland
5/20/2019	Larry Organ	Plan/ Prepare	1.8	Prepare for Kawasaki Depo
5/20/2019	Larry Organ	Deposition	2.5	Appear for Depo of Tom Kawasaki (no show) and travel to and from Oakland
5/27/2019	Larry Organ	Plan/ Prepare	2	Prepare for Tesla PMK deposition
5/28/2019	Larry Organ	Plan/ Prepare	9.4	Prepare for Tesla PMK deposition
5/29/2019	Larry Organ	Plan/ Prepare	2	Prepare for Tesla PMK deposition
5/29/2019	Larry Organ	Deposition	6.7	Deposition of Tesla PMK
6/3/2019	Larry Organ	Communication	1.3	Telephone conf. with Bernard Alexander re potential association
6/3/2019	Larry Organ	Communication	0.2	Discussion with Navruz Avloni regarding the trial
6/4/2019	Larry Organ	Communication	0.2	meet with Nav re Bernard Alexander potential association



Date	User	Activity	Time	Description
6/4/2019	Larry Organ	Plan/ Prepare	2	Prepare for Citistaff PMK
6/5/2019	Larry Organ	Plan/ Prepare	4.2	Prepare for Citistaff PMK depo
6/6/2019	Larry Organ	Plan/ Prepare	0.8	Prepare for Citistaff PMK depo prior to leaving office for depo
6/6/2019	Larry Organ	Deposition	7.8	Appear for Citistaff PMK depo in Oakland and travel to and from Oakland office
6/6/2019	Larry Organ	Communication	0.1	email to Nav and Cimone re deposition and follow up
6/6/2019	Larry Organ	Communication	0.1	Telephone conference with Cimone Nunley regarding meet and confer letter to Citistaff
6/7/2019	Larry Organ	Communication	0.1	Phone conf. with Nav re M&C with OC
6/7/2019	Larry Organ	Communication	0.2	Call with Bernard Alexander regarding continuance of trial date and his agreement to co-counsel case
6/11/2019	Larry Organ	Plan/ Prepare	2.5	Prepare for Michael Wheeler deposition - review documents and testimony
6/12/2019	Larry Organ	Deposition	5.5	Appear for deposition of Michael Wheeler in Oakland and travel to and from Oakland
6/12/2019	Larry Organ	Communication	0.4	Communication with Nav and Cimone re discovery responses
6/14/2019	Larry Organ	Plan/ Prepare	2.5	Prepare for NextSource PMK deposition
6/15/2019	Larry Organ	Plan/ Prepare	4.2	Prepare for Nextsource PMK deposition
6/16/2019	Larry Organ	Plan/ Prepare	4.6	Prepare for nextSource PMK deposition
6/17/2019	Larry Organ	Deposition	10.5	Appear for nextSource PMK deposition and travel to and from Oakland
6/17/2019	Larry Organ	Review/ Analyze	1.5	Review Owen Diaz deposition
6/17/2019	Larry Organ	Meet	0.4	Meet with Navruz Avloni regarding strategy of Titus McCaleb, nextSource PMK, and Owen Diaz depositions
6/18/2019	Larry Organ	Plan/ Prepare	2.5	Prepare Owen Diaz client for deposition Day 3
6/18/2019	Larry Organ	Communication	0.1	Ruling from Court approving trial continuance
6/18/2019	Larry Organ	Communication	0.1	Email to Bernard Alexander re trial continuance
7/8/2019	Larry Organ	Plan/ Prepare	1.8	Prepare for trial - begin formulating ideas for opening statement
7/11/2019	Larry Organ	Communication	0.1	Telephone call with Cimone Nunley regarding clarification on the subpoena issue
7/16/2019	Larry Organ	Meet	1.5	Meet with Cimone Nunley, Navruz Avloni and Meg Organ re witnesses for deposition

Date	User	Activity	Time	Description
7/22/2019	Larry Organ	Communication	0.1	Discussion with Navruz Avloni regarding strategy
7/23/2019	Larry Organ	Communication	0.5	Communication with Bernard Alexander and Nav and Cimone re case strategy
7/23/2019	Larry Organ	Communication	0.1	Follow up discussion with Navruz Avloni and Cimone Nunley after meeting with Bernard Alexander
8/5/2019	Larry Organ	Meet	0.5	Meet with Navruz Avloni, Cimone Nunley, and Noah Baron regarding the "customer" issue
8/5/2019	Larry Organ	Communication	0.1	Discussion of Bernard Alexander's discovery addition suggestions with Cimone Nunley and Navruz Avloni
8/7/2019	Larry Organ	Draft/ Revise	0.4	Review and revise meet and confer letter re discovery requests to Tesla
8/7/2019	Larry Organ	Communication	0.3	Review and revise meet and confer letter re discovery requests to Tesla
8/14/2019	Larry Organ	Draft/ Revise	0.6	Review and revise draft letter and discovery responses
8/14/2019	Larry Organ	Communication	0.1	email to Cimone re changes to discovery dispute statement re Tesla's discovery responses
8/16/2019	Larry Organ	Communication	0.6	Phone call with Bernard Alexander, Nav Avloni and Cimone Nunley re strategy
8/19/2019	Larry Organ	Draft/ Revise	1.3	Research, draft and Email Letter to Tesla re confidentiality of documents in Lambert
8/19/2019	Larry Organ	Review/ Analyze	0.2	Review and analyze court's order re discovery relating to Lambert documents
8/19/2019	Larry Organ	Communication	0.2	Receive email letter re documents in lambert from Danielle Ochs - clearly related to discovery request for same
8/19/2019	Larry Organ	Communication	0.1	Discussion with Navruz Avloni regarding Judge Orrick's discovery dispute order
8/20/2019	Larry Organ	Review/ Analyze	0.4	Review depo summary
8/20/2019	Larry Organ	Communication	0.1	Discussion with Meg re depo summary
8/28/2019	Larry Organ	Draft/ Revise	0.3	Revise M&C letter re Tesla PMK
9/6/2019	Larry Organ	Draft/ Revise	0.5	Review and revise meet and confer letter re Tesla PMK deposition deficiencies
9/6/2019	Larry Organ	Draft/ Revise	0.4	Revise meet and confer letter to citistaff counsel
9/10/2019	Larry Organ	Review/ Analyze	2.5	Review prior discovery requests to prepare for CMC
9/10/2019	Larry Organ	Draft/ Revise	0.3	Draft RPD set 8 to Tesla
9/10/2019	Larry Organ	Appearance/ Attend	2.6	Appear for CMC before Judge Orrick with Cimone Nunley and Navruz Avloni and travel to and from SF and serve RPD Set 8 on Tesla (in person at hearing)
9/10/2019	Larry Organ	Communication	0.1	Text message with Bernard Alexander re new potential trial date

Date	User	Activity	Time	Description
9/11/2019	Larry Organ	Communication	0.1	Phone call with Sabrina re discovery deadline
9/11/2019	Larry Organ	Meet	0.1	Meet with Sabrina to discuss discovery
9/11/2019	Larry Organ	Communication	0.1	Text message exchange with Bernard Alexander confirming availability for trial on May 11, 2020
9/11/2019	Larry Organ	Draft/ Revise	1.6	Review discovery and Tesla's responses and draft SRogs Set 8 and RFA Set 2 to Tesla
9/11/2019	Larry Organ	Communication	0.1	Discussion with Cimone Nunley regarding additional discovery requests
9/12/2019	Larry Organ	Meet	1.2	Phone conf. with Bernard Alexander, Cimone Nunley and Nav Avloni re discovery and expert strategy
9/12/2019	Larry Organ	Review/ Analyze	1.8	Review and analyze legal research re racial harassment and draft outline of thoughts on opening
9/12/2019	Larry Organ	Meet	0.3	Meeting with Cimone Nunley and Navruz Avloni regarding PMK topics
9/13/2019	Larry Organ	Communication	0.1	Communication with Owen Diaz
9/14/2019	Larry Organ	Research	1.5	Research for closing
9/19/2019	Larry Organ	Communication	0.1	Discussed discovery with Navruz Avloni and Cimone Nunley
9/23/2019	Larry Organ	Communication	0.2	Communication with Dr. Reading's office re expert testimony
9/23/2019	Larry Organ	Communication	0.2	Communication with Owen Diaz re expert testimony
9/23/2019	Larry Organ	Communication	0.2	Meet with Nav to discuss experts
9/23/2019	Larry Organ	Communication	0.1	Email to Bernard re experts
9/27/2019	Larry Organ	Communication	0.1	Phone call with Bernard re Reading
9/27/2019	Larry Organ	Communication	0.1	Email to client re meeting with Reading
9/27/2019	Larry Organ	Communication	0.1	Phone call with client re Reading
9/27/2019	Larry Organ	Communication	0.3	Telephone call with Navruz Avloni and Bernard Alexander regarding experts Oppenheimer and Reading
9/27/2019	Larry Organ	Meet	0.1	Meet with Navruz Avloni regarding experts
9/28/2019	Larry Organ	Communication	0.1	Contact with potential expert
9/28/2019	Larry Organ	Communication	0.1	Communication with client re Meet with Reading
9/29/2019	Larry Organ	Communication	0.1	Communication from Bernard re Reading Appointment

Date	User	Activity	Time	Description
9/29/2019	Larry Organ	Communication	0.1	Communication with client re Reading Meeting
9/29/2019	Larry Organ	Communication	0.1	Follow up Communication with client re Reading Meeting
9/29/2019	Larry Organ	Communication	0.1	Phone call with Owen Diaz re meeting with Reading
9/30/2019	Larry Organ	Communication	0.1	Communication with Reading's Office re visit for Owen Diaz
9/30/2019	Larry Organ	Communication	0.1	communication with Owen Diaz re Reading visit
9/30/2019	Larry Organ	Communication	0.1	Further Communication with Reading Office
9/30/2019	Larry Organ	Communication	0.1	further communication with Owen Diaz
9/30/2019	Larry Organ	Communication	0.1	additional follow up with Reading
10/3/2019	Larry Organ	Communication	0.2	discussion with Cimone and Nav re strategy
10/3/2019	Larry Organ	Communication	0.6	discussion re depositions and strategy with Bernard Alexander, Cimone Nunley, and Navruz Avloni
10/3/2019	Larry Organ	Research	0.2	Research re Court's typical rulings on scope of evidence
10/4/2019	Larry Organ	Research	0.4	Legal research re expert disclosures regarding time to disclose and scope of evidence to advise expert regarding timing and her report
10/4/2019	Larry Organ	Communication	0.1	Email from Amy Oppenheimer re expert report and documents
10/4/2019	Larry Organ	Communication	0.1	Communication with Nav Avloni and Cimone Nunley re Oppenheimer
10/4/2019	Larry Organ	Communication	0.1	communication with paralegal Sabrina Grislis re evidence to expert
10/4/2019	Larry Organ	Communication	0.1	Email to Oppenheimer with MSJ papers and discussion of timing of report
10/4/2019	Larry Organ	Plan/ Prepare	1.7	prepare for Tom Kawasaki deposition by reviewing documents
10/5/2019	Larry Organ	Review/ Analyze	3.4	Review deposition exhibits to provide to Amy Oppenheimer
10/5/2019	Larry Organ	Communication	0.1	Emails to Amy Oppenheimer with exhibits to review
10/7/2019	Larry Organ	Communication	0.1	Email to Celina Romano re juror questionnaire
10/7/2019	Larry Organ	Communication	0.1	Communication with Staff re Josue Torres Deposition
10/8/2019	Larry Organ	Communication	0.1	communication with Bernard Alexander re Josue Torres Deposition
10/8/2019	Larry Organ	Communication	0.1	communication with Sabrina Grislis re Josue Torres Depo.

Date	User	Activity	Time	Description
10/8/2019	Larry Organ	Communication	0.1	communication with Sabrina re deposition schedule this week
10/8/2019	Larry Organ	Communication	0.1	Telephone conf. Julianne Stanford re Jackie Delgado deposition
10/8/2019	Larry Organ	Meet	0.1	Meet with Nav re depositions and expert reports
10/8/2019	Larry Organ	Communication	0.1	Communication with Bernard re expert report from Reading
10/8/2019	Larry Organ	Communication	1.3	Phone call with Bernard, Navruz and Cimone re discovery and strategy
10/8/2019	Larry Organ	Meet	0.4	Meet with Cimone re discovery and trial issues
10/8/2019	Larry Organ	Plan/ Prepare	3.8	Review documents and deposition testimony relating to Tom Kawasaki
10/8/2019	Larry Organ	Plan/ Prepare	1.3	Prepare for Kawasaki Depo - review depo testimony
10/8/2019	Larry Organ	Communication	0.3	Discussion with Cimone Nunley regarding depositions
10/9/2019	Larry Organ	Plan/ Prepare	3.4	Prepare for Kawasaki deposition - outline and exhibit review
10/9/2019	Larry Organ	Review/ Analyze	0.5	Review discovery responses
10/9/2019	Larry Organ	Deposition	4.2	Deposition of Tom Kawasaki and travel to and from Oakland - trial subpoena issued
10/9/2019	Larry Organ	Draft/ Revise	0.8	Review and Revise discovery responses (0.6) and discuss with Cimone (0.2)
10/9/2019	Larry Organ	Communication	0.1	Communication with Charles Mahla re Diaz expert designation
10/9/2019	Larry Organ	Plan/ Prepare	0.9	Review deposition testimony re Jackelin Delgado
10/9/2019	Larry Organ	Communication	0.1	Communication with Sabrina Grislis regarding Josue Torres deposition
10/9/2019	Larry Organ	Communication	0.1	Discuss Josue Torres deposition with Navruz Avloni following her review of his emails regarding availability
10/9/2019	Larry Organ	Communication	0.3	Discuss Josue Torres deposition with Cimone Nunley
10/10/2019	Larry Organ	Plan/ Prepare	1.6	Prepare for Jackelin Delgado Deposition
10/10/2019	Larry Organ	Deposition	2.8	Jackelin Delgado Deposition
10/10/2019	Larry Organ	Communication	0.1	Text message to Julianne re deposition
10/10/2019	Larry Organ	Communication	0.2	Call with Nav and Cimone re expert disclosures
10/10/2019	Larry Organ	Communication	0.3	Phone conf. with Amy Oppenheimer re expert report

Date	User	Activity	Time	Description
10/10/2019	Larry Organ	Communication	0.1	Call with Nav Avloni and Cimone Nunley re deposition strategy
10/10/2019	Larry Organ	Review/ Analyze	0.2	Review Expert Report of Charles Mahla
10/11/2019	Larry Organ	Draft/ Revise	6.3	Revise Expert Disclosures and review materials
10/11/2019	Larry Organ	Communication	0.3	Phone call with Bernard re Dr. Reading report
10/11/2019	Larry Organ	Communication	0.2	Phone call with Amy Oppenheimer re expert report and supporting documents
10/11/2019	Larry Organ	Communication	0.1	communication with Charles Mahla re expert report
10/14/2019	Larry Organ	Plan/ Prepare	1.9	Prepare for the Veronica Martinez depo
10/14/2019	Larry Organ	Communication	0.1	Telephone call with Cimone Nunley and Navruz Avloni regarding Marconi deposition stipulation
10/15/2019	Larry Organ	Draft/ Revise	0.4	Revise Joint Discovery Dispute Letter
10/15/2019	Larry Organ	Plan/ Prepare	2.5	Prepare for deposition of Veronica Martinez
10/15/2019	Larry Organ	Appearance/ Attend	5.5	Appear for Deposition of Veronica Martinez and travel to and from Oakland
10/16/2019	Larry Organ	Plan/ Prepare	6	Prepare for Erin Marconi Deposition - review and analyze documents
10/16/2019	Larry Organ	Communication	2.6	Draft Meet and Confer letter re Confidential designations re Tesla documents
10/16/2019	Larry Organ	Communication	0.1	Email to Tesla OC re confidential document designations
10/18/2019	Larry Organ	Communication	0.1	Call with Cimone re discovery dispute letter
10/18/2019	Larry Organ	Draft/ Revise	2.4	Draft Jt Discovery letter
10/18/2019	Larry Organ	Communication	0.1	EMail to Patricia J. indicating will be sending Jt Dispute Letter
10/18/2019	Larry Organ	Other	0.1	File Joint Dispute Letter re Site Inspection and Stipulation
10/18/2019	Larry Organ	Communication	0.4	email exchange with Patricia J re jt dispute letter
10/18/2019	Larry Organ	Draft/ Revise	0.3	further revise letter to address confidential issues
10/18/2019	Larry Organ	Draft/ Revise	0.2	Receive Jt Letter with Defendant's Position at approximately 11:43 pm - edit document to file, file document through ECF
10/18/2019	Larry Organ	Plan/ Prepare	0.9	Prepare for Erin Marconi deposition - reviewing documents
10/18/2019	Larry Organ	Communication	0.1	Discussion with co-counsel regarding discovery dispute issues strategy

Date	User	Activity	Time	Description
10/19/2019	Larry Organ	Review/ Analyze	1.5	Review defendant's position in Jt Letter received at 11:43 pm on 10/18 and review evidence cited by defendant and other depositions and documents
10/19/2019	Larry Organ	Communication	0.1	Email to Patricia Jeng re misrepresentation by Defendant and suggested fix
10/19/2019	Larry Organ	Draft/ Revise	0.3	Revise Jt Letter re additional deposition of Mr. Donet
10/19/2019	Larry Organ	Draft/ Revise	0.3	After no response to Meet and Confer efforts, further revise Jt Letter to come from Plaintiff with corrections
10/19/2019	Larry Organ	Communication	0.2	Email to Ms. Jeng re corrected Jt statement and request for response
10/19/2019	Larry Organ	Communication	0.1	Phone Message for Patricia Jeng re Jt Letter
10/19/2019	Larry Organ	Review/ Analyze	4.2	Review documents and draft letter re confidential designations improperly made by defendant
10/19/2019	Larry Organ	Communication	0.1	Email to OC re confidential designations
10/20/2019	Larry Organ	Draft/ Revise	1.2	Review Citistaff documents and draft letter to OC re confidential designations
10/20/2019	Larry Organ	Draft/ Revise	1.4	Review additional documents re Tesla confidential designations and draft letter re same
10/20/2019	Larry Organ	Plan/ Prepare	1.3	Prepare for Erin Marconi deposition by reviewing documents
10/20/2019	Larry Organ	Plan/ Prepare	6.4	Prepare for Erin Marconi Depo
10/21/2019	Larry Organ	Deposition	16.7	Appear for deposition of Erin Marconi and travel to and from Los Angeles (Bernard had trial conflict)
10/21/2019	Larry Organ	Communication	0.1	Call with Cimone re letter to court; confidentiality designations; new joint employer case
10/22/2019	Larry Organ	Draft/ Revise	2.3	Review documents produced by Defendant and Draft letter to Tesla Counsel re confidential designations
10/22/2019	Larry Organ	Communication	0.1	Email to Tesla OC re Confidential Designations for Bates 408-889
10/23/2019	Larry Organ	Review/ Analyze	0.1	Review Order from Court re discovery
10/23/2019	Larry Organ	Communication	0.1	Communication with Julianne re expert deposition
10/23/2019	Larry Organ	Communication	0.1	communication with Cimone discovery order
10/23/2019	Larry Organ	Communication	0.1	Communication with Navruz re discovery order
10/23/2019	Larry Organ	Communication	0.1	communication with Bernard re deposition
10/24/2019	Larry Organ	Plan/ Prepare	2.2	Prepare for deposition of Andres Donet
10/24/2019	Larry Organ	Deposition	5.8	Appear for Deposition of Andres Donet and travel to and from Palo Alto



Date	User	Activity	Time	Description
10/24/2019	Larry Organ	Communication	0.2	Telephone conference with Navruz Avloni regarding Andres Donet deposition: time, location, strategy, logistics, and relevant documents
10/26/2019	Larry Organ	Communication	0.1	Review email from Tesla and respond to issue re confidential designations
10/30/2019	Larry Organ	Communication	1.1	Meet and confer with Reanne Swafford-Harris re confidential designations - primary rationale is only produced for use in this litigation - suggested she agree to remove confidentiality for trial and MSJ opposition - she only said trial which is already covered
11/1/2019	Larry Organ	Communication	0.4	Phone conf. with Reanne Swafford and Patricia Jeng re meet and confer re designating depo exhibits non-confidential for filing MSJ opp
11/1/2019	Larry Organ	Other	0.1	Notes re conversation with Swafford and Jeng re designations
11/4/2019	Larry Organ	Review/ Analyze	0.5	Review Tesla MSJ
11/4/2019	Larry Organ	Meet	0.5	communication with Bernard Alexander and Cimone Nunley discussing MSJ motion and delegation of work
11/4/2019	Larry Organ	Communication	0.1	Phone conf. with Cimone Nunley re confidential designations of depositions
11/4/2019	Larry Organ	Communication	0.1	Telephone conference with Navruz Avloni and Cimone Nunley regarding Natasha assisting on deposition summaries
11/6/2019	Larry Organ	Review/ Analyze	0.8	Review exhibits for use by Bernard in Punis opposition arguments to Tesla MSJ
11/6/2019	Larry Organ	Communication	0.1	Email to Bernard Alexander re Punis argument in Tesla MSJ
11/7/2019	Larry Organ	Communication	0.2	Phone conf. with Owen Diaz re work issues
11/7/2019	Larry Organ	Communication	0.1	Initial phone call with Owen Diaz re work issues
11/8/2019	Larry Organ	Communication	0.1	meet with Cimone re confidential documents
11/8/2019	Larry Organ	Research	1.4	Internet research re Tesla maintaining documents confidential
11/8/2019	Larry Organ	Communication	0.2	Discussion with Navruz Avloni and Cimone Nunley regarding expert discovery cutoff, expert depositions, and supplemental disclosures
11/9/2019	Larry Organ	Review/ Analyze	1.4	Review and analyze prior Tesla HR testimony
11/11/2019	Larry Organ	Communication	0.1	Telephone conference with Cimone Nunley regarding expert deposition objections
11/12/2019	Larry Organ	Meet	0.3	Meet with Cimone re Tela MSJ
11/12/2019	Larry Organ	Research	2.1	Research re punitive damages issues with regards to Tesla MSJ
11/12/2019	Larry Organ	Communication	0.1	Phone call with witness re Owen



Date	User	Activity	Time	Description
11/13/2019	Larry Organ	Communication	0.2	Discussion with Cimone re Tesla MSJ opposition
11/13/2019	Larry Organ	Communication	0.1	Email from Tesla (Jeng) re production of witness contact information
11/13/2019	Larry Organ	Communication	0.1	Phone call with Cimone re discovery response by Tesla
11/13/2019	Larry Organ	Communication	0.1	Email to Tesla OC re deficient discovery response
11/15/2019	Larry Organ	Communication	0.2	Meet with Cimone re Opposition to MSJ
11/17/2019	Larry Organ	Draft/ Revise	7	Revise MSA Opposition to TESLA and legal and factual research re same
11/17/2019	Larry Organ	Communication	0.1	Email to Cimone re Tesla MSJ opposition
11/19/2019	Larry Organ	Review/ Analyze	0.9	Review Defendant's Motion to Maintain Confidentiality
11/19/2019	Larry Organ	Communication	0.4	Meet with Cimone re MSJ opposition papers
11/20/2019	Larry Organ	Draft/ Revise	0.3	Draft Introduction to Opposition to Motion for Confidentiality
11/20/2019	Larry Organ	Communication	0.1	Email with Bernard Alexander re briefing
11/21/2019	Larry Organ	Communication	0.2	Discussed proposed stipulation to designate Wayne Jackson testimony with Cimone Nunley
11/25/2019	Larry Organ	Communication	0.3	Review meet and confer emails with Tesla counsel re court's order to produce coworker contact information
12/7/2019	Larry Organ	Communication	2.5	draft declaration to accompany opposition to Tesla Motion to retain confidentiality and review notes and Tesla's papers
12/7/2019	Larry Organ	Communication	0.1	Call with Cimone Nunley regarding opposition to Tesla's motion to retain confidentiality
12/30/2019	Larry Organ	Meet	0.8	Telephone conference with Bernard Alexander and Cimone Nunley re settlement strategies
12/31/2019	Larry Organ	Communication	0.2	Email to clients re MSC and other matters
1/2/2020	Larry Organ	Review/ Analyze	0.4	Review settlement conference statement
1/2/2020	Larry Organ	Meet	0.6	Meet with Bernard Alexander, Cimone Nunley, Navruz Avloni and Susan Organ re MSC and case strategy
1/2/2020	Larry Organ	Communication	0.1	Meet with Cimone re MSC statement
1/3/2020	Larry Organ	Communication	0.4	Telephone call with Navruz Avloni and Cimone Nunley regarding sanctions motion, depositions, witnesses, trial strategy.
1/13/2020	Larry Organ	Communication	0.1	Phone call with Owen Diaz re MSC and AC Transit
1/13/2020	Larry Organ	Communication	0.3	Telephone call with Cimone Nunley and clients to discuss mandatory settlement conference

Date	User	Activity	Time	Description
1/13/2020	Larry Organ	Communication	0.3	Discussion with Cimone Nunley regarding mandatory settlement conference and confidential issues relating to Owen Diaz
1/14/2020	Larry Organ	Communication	0.1	Phone conf. with Bernard re discovery motion to compel; Recorder
1/14/2020	Larry Organ	Communication	0.1	Phone call with Alaina Lancaster from the Recorder re motion for sanctions
1/14/2020	Larry Organ	Communication	0.1	Review emails concerning deposition of Dr. Reading in LA
1/14/2020	Larry Organ	Communication	0.1	Discussion with Cimone Nunley regarding reading invoice, deposition
1/15/2020	Larry Organ	Plan/ Prepare	1.3	Review MSC documents
1/16/2020	Larry Organ	Communication	11.2	mediation with Tesla, NextSource, Citistaff - Clients, Cimone and Bernard Alexander in attendance - Tesla did not send a client representative nor did its lead trial counsel appear, though an attorney from counsel's office did appear
1/17/2020	Larry Organ	Communication	0.1	Discussion with Navruz Avloni and Cimone Nunley regarding publication of Owen Diaz's confidential, personal information in Tesla filing
1/22/2020	Larry Organ	Communication	0.2	Discussion with Cimone Nunley regarding confidential designations
1/28/2020	Larry Organ	Communication	0.6	Telephone conf. with Bernard Alexander and Harry Plotkin re jury selection; discussed expenses with Bernard Alexander
1/28/2020	Larry Organ	Communication	0.1	Communication with Cimone re Jury Consultant
1/28/2020	Larry Organ	Communication	0.3	Email to Harry Plotkin re information relating to case
1/28/2020	Larry Organ	Communication	0.3	Discussion with Cimone Nunley regarding motion for sanctions
2/5/2020	Larry Organ	Communication	0.1	Phone call with Amy Oppenheimer re deposition and report
2/9/2020	Larry Organ	Communication	0.2	communication with Amy Oppenheimer
2/13/2020	Larry Organ	Communication	1.1	Phone call with Harry Plotkin, Bernard Alexander, Cimone Nunley and Susan Organ re trial strategy and preparation
2/13/2020	Larry Organ	Communication	0.2	Communication with Cimone Nunley regarding objections to deposition notice
2/20/2020	Larry Organ	Communication	0.1	Discuss payment of focus group fee with Cimone Nunley
2/24/2020	Larry Organ	Review/ Analyze	0.7	Review Oppenheimer report
2/25/2020	Larry Organ	Deposition	4.1	Appear for deposition of Charles Mahla and travel to and from San Francisco
2/25/2020	Larry Organ	Communication	0.2	Phone call with Amy Oppenheimer re expert opinion
2/25/2020	Larry Organ	Communication	0.2	Discuss pretrial checklist with Cimone Nunley

Date	User	Activity	Time	Description
2/25/2020	Larry Organ	Communication	0.1	Discuss settlement status, issues with Cimone Nunley
2/26/2020	Larry Organ	Communication	0.2	Meet with Owen Diaz re case
2/28/2020	Larry Organ	Communication	0.1	Court filing re Brett Young
3/3/2020	Larry Organ	Plan/ Prepare	5.3	Prepare for trial - review depositions and documents
3/3/2020	Larry Organ	Communication	0.2	Discussion with Cimone Nunley regarding witness Jakel Williams
3/3/2020	Larry Organ	Communication	0.1	Discuss pretrial conference call scheduling with Cimone Nunley
3/4/2020	Larry Organ	Plan/ Prepare	6.1	Prepare for trial - review depositions and documents
3/5/2020	Larry Organ	Communication	0.1	Meet with Nav re strategy for Diaz expert
3/5/2020	Larry Organ	Research	1.9	Legal research re jury instructions
3/5/2020	Larry Organ	Research	2.5	Research Jury Instructions and special instructions
3/5/2020	Larry Organ	Plan/ Prepare	4.2	Review Depositions and exhibits
3/5/2020	Larry Organ	Communication	0.3	Telephone conference with Cimone Nunley regarding impeachment documents
3/6/2020	Larry Organ	Communication	0.1	Communication from Court re courtcall on Tuesday
3/6/2020	Larry Organ	Communication	0.2	Phone call with Bernard re scheduling and trial
3/6/2020	Larry Organ	Plan/ Prepare	6.5	Review expert materials for meeting
3/7/2020	Larry Organ	Plan/ Prepare	2.5	Prepare for meeting with Oppenheimer
3/7/2020	Larry Organ	Meet	2.5	Meet with Amy Oppenheimer and travel to and from Berkeley
3/9/2020	Larry Organ	Communication	0.1	Phone call with Owen Diaz
3/9/2020	Larry Organ	Deposition	8.9	Deposition of Expert Amy Oppenheimer and travel to and from San Francisco
3/10/2020	Larry Organ	Communication	0.1	Phone call with Dr. Reading's office
3/10/2020	Larry Organ	Communication	0.3	CourtCall appearance with Judge Orrick re trial scheduling (0.2) and hold time prior to hearing (0.1)
3/10/2020	Larry Organ	Meet	1.2	Meet with Cimone Nunley, Sabrina Grislis, and Susan Organ to discuss case status and upcoming to do items
3/10/2020	Larry Organ	Communication	0.1	Discussion with Cimone Nunley following her call with Cody from Amy Oppenheimer's office on clarification of invoice

Date	User	Activity	Time	Description
3/11/2020	Larry Organ	Plan/ Prepare	6.7	Review depositions and exhibits to prepare for exchange of information with Tesla
3/11/2020	Larry Organ	Communication	0.4	Discussion with Cimone Nunley regarding confidentiality challenge to West Valley
3/11/2020	Larry Organ	Communication	0.1	Discuss missed status conference with Judge Illman with Cimone Nunley
3/12/2020	Larry Organ	Review/ Analyze	0.8	Review costs for accounting to client
3/12/2020	Larry Organ	Communication	0.5	Meet with client re costs and other strategy issues
3/12/2020	Larry Organ	Plan/ Prepare	4	Prepare for trial - review exhibits with Susan for exhibit list
3/12/2020	Larry Organ	Plan/ Prepare	3.4	Prepare for trial - review documents and depo testimony
3/12/2020	Larry Organ	Communication	0.1	Telephone call with Cimone Nunley about scheduling call with Bernard Alexander and Harry Plotkin
3/13/2020	Larry Organ	Communication	0.1	Email to Tracey Kennedy re meet and confer for pretrial matters
3/13/2020	Larry Organ	Communication	0.2	Phone call with Bernard re dates for meeting with OC, deadlines
3/13/2020	Larry Organ	Communication	0.1	Email response to Tracey re preferred date for meeting
3/13/2020	Larry Organ	Communication	1	Meet with Bernard, Cimone, Harry and Susan re strategy and tasks, jury selection, MILs
3/13/2020	Larry Organ	Plan/ Prepare	3.5	Work with Susan re reviewing exhibits for relevance, foundation and exhibit list
3/13/2020	Larry Organ	Plan/ Prepare	3.4	Review deposition testimony and prepare witness examination
3/14/2020	Larry Organ	Plan/ Prepare	2.2	Prepare for trial - review exhibits and work on exhibit list
3/15/2020	Larry Organ	Plan/ Prepare	4.2	Prepare for trial - work with Susan on exhibit list - review prior exhibits and testimony for foundation issues
3/16/2020	Larry Organ	Plan/ Prepare	7	Prepare for trial - review exhibits and testimony for exhibit list and witness examination
3/17/2020	Larry Organ	Plan/ Prepare	6.6	Prepare for trial - review witness testimony and deposition exhibits to prepare exhibit list and examinations
3/18/2020	Larry Organ	Plan/ Prepare	8.4	Prepare for trial - review exhibits and documents and testimony for preparation of exhibit list
3/19/2020	Larry Organ	Plan/ Prepare	7.5	Prepare for trial reviewing exhibits and testimony and work on exhibit list
3/20/2020	Larry Organ	Plan/ Prepare	4.5	work on finalizing exhibit list
3/20/2020	Larry Organ	Plan/ Prepare	3.5	work on Witness list
3/20/2020	Larry Organ	Communication	0.4	Telephone conference with Cimone Nunley regarding the new Supreme Court case relating to section 1981

Date	User	Activity	Time	Description
3/20/2020	Larry Organ	Communication	0.2	Telephone conference with Cimone Nunley regarding the Ellerth/Faragher defense
3/20/2020	Larry Organ	Communication	0.2	Telephone conference with Cimone Nunley regarding the Ellerth/Faragher defense
3/21/2020	Larry Organ	Plan/ Prepare	8.5	Prepare for trial - draft and revise jury instructions and research relating to same
3/21/2020	Larry Organ	Communication	0.1	Phone call with Cimone re MILs
3/21/2020	Larry Organ	Communication	0.1	Follow up Phone call with Cimone re MILs
3/22/2020	Larry Organ	Communication	0.5	Phone call with Nav and Cimone re MILs and strategy
3/22/2020	Larry Organ	Communication	0.5	Phone call with Bernard and Cimone re Trial Strategy and Jury Instructions, Voir Dire, and MILs
3/22/2020	Larry Organ	Plan/ Prepare	9.5	Prepare for trial - Draft and revise jury instructions and research re same and designation of depositions
3/22/2020	Larry Organ	Communication	0.1	Phone call with Sabrina re exhibits
3/22/2020	Larry Organ	Communication	0.1	Email to Bernard re jury instructions
3/23/2020	Larry Organ	Communication	0.1	Email to Harry Plotkin re Voir Dire
3/23/2020	Larry Organ	Communication	0.1	PHone call with Sabrina re form of exhibits
3/23/2020	Larry Organ	Communication	0.1	EMail from Bernard Alexander re juror questionnaire
3/23/2020	Larry Organ	Communication	0.3	Phone call with Bernard Alexander regarding verdict form and punitive damages
3/23/2020	Larry Organ	Communication	0.1	Email exchange with Tracy re deposition designations
3/23/2020	Larry Organ	Communication	0.1	Email exchange with Tracey re scheduling of additional days for meet and confer
3/23/2020	Larry Organ	Communication	0.5	Telephone calls with Cimone Nunley regarding MILs, Dr. Reading's report, and the trial brief
3/23/2020	Larry Organ	Plan/ Prepare	12.7	Prepare for trial - revise trial brief, revise jury instructions and verdict form and research re same; prepare depo designations
3/23/2020	Larry Organ	Review/ Analyze	0.8	Review defendant's documents for pretrial conf.
3/24/2020	Larry Organ	Meet	0.7	Phone conf. with Bernard, Cimone and Susan to discuss division of labor and strategy
3/24/2020	Larry Organ	Communication	0.1	Phone call with Sabrina re witness information
3/24/2020	Larry Organ	Plan/ Prepare	8.5	Prepare for pretrial conf by reviewing defense exhibits
3/24/2020	Larry Organ	Communication	0.2	Telephone conference with Navruz Avloni and Cimone Nunley regarding me too witnesses, MILs, and punitive damages

Date	User	Activity	Time	Description
3/25/2020	Larry Organ	Meet	0.4	Phone call with Bernard and Cimone re strategy prior to call with Defense counsel tomorrow
3/25/2020	Larry Organ	Communication	0.4	Phone call with Cimone re jury instructions and claims
3/25/2020	Larry Organ	Plan/ Prepare	10.3	Prepare for Pretrial Conf. meeting with OC - review jury instructions and exhibits to see differences and review other Pretrial conf. materials
3/26/2020	Larry Organ	Meet	0.8	Zoom Meeting with Tracey Kennedy, Patricia Jeng, Susan Haines, Brett Young, Namal Tantula, Stephanie Limbaugh, Bernard Alexander and Cimone Nunley to discuss Jury Instructions, Witness List, Exhibit List, Voir Dire and Juror Questionnaire, Discovery Designations
3/26/2020	Larry Organ	Communication	0.3	Phone call with Cimone and Bernard (after Zoom Meeting) to discuss strategy
3/26/2020	Larry Organ	Communication	0.1	Email to Harry Plotkin re juror questionnaire
3/26/2020	Larry Organ	Communication	0.1	email to OC re juror questionnaire
3/26/2020	Larry Organ	Communication	0.1	email to OC with witness list
3/26/2020	Larry Organ	Communication	0.1	email to OC re jury instructions
3/26/2020	Larry Organ	Communication	0.1	Email to OC re exhibit list
3/26/2020	Larry Organ	Review/ Analyze	4.9	Review and analyze exhibit list and defense list to check similarities and differences and prepare revised exhibit list with this information
3/26/2020	Larry Organ	Communication	0.1	Phone call with Bernard prior to Zoom meeting with OC
3/27/2020	Larry Organ	Plan/ Prepare	6.5	Review Pretrial documents and deposition testimony
3/27/2020	Larry Organ	Meet	0.4	Meet with Navruz Avloni and Cimone Nunley regarding trial strategy
3/28/2020	Larry Organ	Plan/ Prepare	4.5	Prepare for pretrial discussions by reviewing documents and testimony
3/29/2020	Larry Organ	Plan/ Prepare	3.9	Review pretrial documents and testimony to prepare for tomorrow's meeting
3/30/2020	Larry Organ	Communication	0.2	Email exchange with Sabrina re deposition transcripts
3/30/2020	Larry Organ	Meet	0.5	Meet with Tracey et al and Bernard and Cimone re FSC documents
3/30/2020	Larry Organ	Communication	0.4	Phone call with Bernard and Cimone re strategy re FSC negotiations and tasks
3/30/2020	Larry Organ	Research	2.4	Research re Comcast v. NAACP and potential impact on case in context of harassment cases
3/30/2020	Larry Organ	Review/ Analyze	1.5	Review proposed revisions and other issues relating to jury instructions proposed by Tracey Kennedy

Date	User	Activity	Time	Description
3/30/2020	Larry Organ	Communication	0.1	Email from Tracey Kennedy re Jury instructions
3/30/2020	Larry Organ	Review/ Analyze	1.8	Review Defense depo designations and create table re same with notes and objections
3/31/2020	Larry Organ	Review/ Analyze	0.4	Review and analyze pretrial conference joint statement
3/31/2020	Larry Organ	Communication	0.2	Email communication with Cimone and Bernard re additions to pretrial statement
3/31/2020	Larry Organ	Review/ Analyze	0.2	Review stipulation and send comments to Bernard and Cimone
3/31/2020	Larry Organ	Review/ Analyze	0.6	review motions in limine and comment to Cimone Nunley re edits to Motions in limine
3/31/2020	Larry Organ	Plan/ Prepare	4.5	Review deposition testimony for pretrial conference issues
3/31/2020	Larry Organ	Review/ Analyze	1.3	Analyze Owen Diaz testimony re complaints
3/31/2020	Larry Organ	Communication	0.2	Telephone conference with Cimone Nunley regarding stipulation for dismissal and me sending it to Tesla's counsel
4/1/2020	Larry Organ	Review/ Analyze	0.6	Review discovery responses
4/1/2020	Larry Organ	Communication	0.5	Meeting with Tracey et al and Bernard and Cimone
4/1/2020	Larry Organ	Communication	0.5	Phone conf. with Bernard and Cimone re strategy and task assignments
4/1/2020	Larry Organ	Plan/ Prepare	0.8	Prepare for trial - plan out anticipated cross examination by Tracey Kennedy
4/1/2020	Larry Organ	Communication	0.1	Phone call with Cimone re stipulation on MILs
4/1/2020	Larry Organ	Review/ Analyze	0.1	Review proposed stipulation on MILs
4/1/2020	Larry Organ	Communication	0.1	Telephone conference with Cimone Nunley regarding Judge Orrick's order granting the trial continuance
4/2/2020	Larry Organ	Communication	0.4	Call with Bernard Alexander and Cimone Nunley re strategy re settlement, MILs
4/2/2020	Larry Organ	Communication	0.1	Email to Bernard re costs
4/2/2020	Larry Organ	Communication	0.1	Discussion with Sabrina re witness information
4/2/2020	Larry Organ	Communication	0.4	Phone conf. with Cimone re in limine motion oppositions
4/2/2020	Larry Organ	Draft/ Revise	2.6	Review discovery responses of all parties and Revise Plaintiff's designation of discovery
4/2/2020	Larry Organ	Communication	0.1	email to OC with revised discovery designations
4/2/2020	Larry Organ	Research	0.9	Research re Def. MIL 4 re closing argument



Date	User	Activity	Time	Description
4/3/2020	Larry Organ	Draft/ Revise	0.5	Review and Revise joint witness list
4/3/2020	Larry Organ	Communication	0.2	Phone call with Cimone, Nav and Sabrina to discuss witness information for subpoena for trial
4/3/2020	Larry Organ	Communication	0.2	Phone call with Nav re witness information
4/3/2020	Larry Organ	Communication	0.2	Phone call with Bernard re focus group issues
4/3/2020	Larry Organ	Communication	0.1	Email from jury consultant
4/3/2020	Larry Organ	Communication	0.1	Email to jury consultant re focus group
4/3/2020	Larry Organ	Meet	0.4	Meeting with Tracey Kennedy et al and Bernard and Cimone re Final Status Conf. Documents -- With respect to current employees, Tesla said they would accept service for those or at least coordinate their appearance
4/3/2020	Larry Organ	Communication	0.1	Phone call with Sabrina re exhibits
4/3/2020	Larry Organ	Communication	0.1	Phone call with Bernard and Cimone re assignments
4/3/2020	Larry Organ	Communication	0.1	Email to Sabrina re objections to deposition designations
4/6/2020	Larry Organ	Communication	0.1	Phone call with Cimone and Nav and Sabrina re case status
4/6/2020	Larry Organ	Plan/ Prepare	1.9	Research and editing of Joint Statement of Disputed Issues and Facts
4/6/2020	Larry Organ	Communication	0.1	Email to Bernard and Cimone re Jt. Statement
4/6/2020	Larry Organ	Research	2.6	Research re Def. Motion In Limine No. 4
4/6/2020	Larry Organ	Plan/ Prepare	1.4	Review deposition testimony of Joshua Mantz
4/6/2020	Larry Organ	Communication	0.8	Discuss demonstrative exhibits with Susan Organ
4/7/2020	Larry Organ	Appearance/ Attend	0.3	Status Conf. with Judge Illman and Tracey and Patricia and Cimone
4/7/2020	Larry Organ	Communication	0.6	Phone call with Cimone Nunley and Bernard Alexander re pretrial statement and other pretrial matters
4/7/2020	Larry Organ	Communication	0.6	Phone call with Nav and Cimone re trial prep work
4/7/2020	Larry Organ	Plan/ Prepare	0.9	Prepare for trial - objections to defendant's discovery designations
4/7/2020	Larry Organ	Plan/ Prepare	6	Prepare for trial - review depo exhibits and trial testimony to develop demonstratives
4/7/2020	Larry Organ	Meet	0.4	Meet with opposing counsel to discuss pretrial matters



Date	User	Activity	Time	Description
4/7/2020	Larry Organ	Communication	0.2	Telephone conference with Cimone Nunley regarding the upcoming status conference with Judge Illman
4/8/2020	Larry Organ	Communication	0.1	Phone Meeting with Sabrina, Cimone and Nav re tasks
4/8/2020	Larry Organ	Communication	0.1	Email to staff re Donet deposition
4/8/2020	Larry Organ	Plan/ Prepare	1.1	Review defendant's depo designations for demetric
4/8/2020	Larry Organ	Plan/ Prepare	4.2	review exhibits and depo testimony to develop demonstrative exhibits
4/8/2020	Larry Organ	Communication	0.1	Telephone conference with Cimone Nunley regarding MIL on the exclusion of Plaintiff Owen Diaz's work performance
4/9/2020	Larry Organ	Plan/ Prepare	1.8	Review designated depo testimony and prepare objections
4/9/2020	Larry Organ	Plan/ Prepare	4.4	Review depo testimony and exhibits
4/10/2020	Larry Organ	Communication	0.5	Phone call with Bernard, Cimone, Navruz and Susan to discuss trial tasks and strategy
4/10/2020	Larry Organ	Plan/ Prepare	1.2	Prepare for trial - finalize objections to deposition testimony and designated discovery
4/10/2020	Larry Organ	Communication	0.1	email to OC re Objections to Defense designations of discovery and depositions
4/10/2020	Larry Organ	Review/ Analyze	1.5	Review defense designations and edit objections re same
4/10/2020	Larry Organ	Communication	0.1	phone conf. with Sabrina re exhibits
4/10/2020	Larry Organ	Communication	0.1	Phone call with Cimone re witnesses
4/10/2020	Larry Organ	Plan/ Prepare	0.8	review documents and deposition testimony
4/10/2020	Larry Organ	Plan/ Prepare	0.7	Review demonstratives and make edits
4/10/2020	Larry Organ	Plan/ Prepare	0.9	Review transcripts of Tracey Kennedy opening in another case
4/11/2020	Larry Organ	Communication	0.1	Communication from Tracey Kennedy re objections
4/11/2020	Larry Organ	Review/ Analyze	0.1	Review proposed change to designations
4/11/2020	Larry Organ	Communication	0.1	Email to Tracey Kennedy
4/11/2020	Larry Organ	Communication	0.1	Email from Nav re Joint Statement
4/11/2020	Larry Organ	Communication	0.1	Communication to team re joint statement
4/11/2020	Larry Organ	Communication	0.2	Communication with Cimone re strategy

Date	User	Activity	Time	Description
4/11/2020	Larry Organ	Draft/ Revise	0.9	Revise joint statement
4/11/2020	Larry Organ	Plan/ Prepare	1.8	Review exhibits and Review documents to add to exhibits
4/11/2020	Larry Organ	Communication	0.1	Email from Tracey re my email To her
4/12/2020	Larry Organ	Draft/ Revise	1.5	Revise Joint Statement of Disputed Facts and Law
4/12/2020	Larry Organ	Communication	0.1	communication with staff re legal issue
4/12/2020	Larry Organ	Plan/ Prepare	1.7	Prepare for trial - review jury instructions and revise and legal research re same
4/13/2020	Larry Organ	Communication	0.5	Discuss theme with jury consultant
4/13/2020	Larry Organ	Communication	0.2	Telephone call with Cimone Nunley regarding resetting the call with opposing counsel
4/14/2020	Larry Organ	Research	4.1	Research section 1981 case law regarding liability issues
4/15/2020	Larry Organ	Communication	0.2	Phone call with Navruz re section 1981 standards
4/16/2020	Larry Organ	Communication	0.6	Meet with Tracey et al re joint statement and other tasks
4/16/2020	Larry Organ	Meet	1	Phone conf. with Nav and Cimone re strategy
4/16/2020	Larry Organ	Communication	0.1	Email from Susan Haines re witness list
4/16/2020	Larry Organ	Draft/ Revise	0.4	Revise Joint Witness List
4/16/2020	Larry Organ	Communication	0.1	Email to Susan Haines re revised witness list
4/16/2020	Larry Organ	Review/ Analyze	0.8	Review and revise demonstratives
4/16/2020	Larry Organ	Research	1.5	jury instructions research
4/16/2020	Larry Organ	Plan/ Prepare	2	prepare for trial by reviewing joint statement and exhibit list
4/16/2020	Larry Organ	Communication	0.1	Phone call with Cimone Nunley to provide clarification on two items from our meeting with Defense counsel
4/17/2020	Larry Organ	Meet	2.1	Meet with Bernard, Harry, Cimone, Nav, Sabrina, and Susan re themes and strategy for trial
4/17/2020	Larry Organ	Plan/ Prepare	0.6	Review times for witnesses and revise joint witness list and spreadsheet summary of times
4/17/2020	Larry Organ	Communication	0.1	Email to Stephanie L. re Defense Exhibits
4/17/2020	Larry Organ	Communication	0.1	Email to Susan Haines re witness list and times for trial

Date	User	Activity	Time	Description
4/18/2020	Larry Organ	Draft/ Revise	3.1	Revise Jury Instructions
4/18/2020	Larry Organ	Communication	0.1	Email exchange with Tracey re juror questionnaire
4/18/2020	Larry Organ	Draft/ Revise	0.3	Review and revise juror questionnaire
4/18/2020	Larry Organ	Communication	0.1	Email to Harry re juror questionnaire
4/18/2020	Larry Organ	Communication	0.1	Phone call with Cimone re MILs
4/19/2020	Larry Organ	Plan/ Prepare	0.3	Prepare for trial - review juror questionnaire and email correspondence with Harry and Bernard re same
4/19/2020	Larry Organ	Communication	0.1	Email to Tracey Kennedy re juror questionnaire
4/19/2020	Larry Organ	Communication	0.1	communication with Bernard re remaining tasks
4/19/2020	Larry Organ	Plan/ Prepare	7.5	Prepare for trial - review and edit in limine motions and research re same
4/20/2020	Larry Organ	Communication	0.1	email from Tracey re juror questionnaire
4/20/2020	Larry Organ	Communication	0.1	Email to juror consultant re questionnaire
4/20/2020	Larry Organ	Communication	0.6	phone call with Cimone re MILs and strategy issue
4/20/2020	Larry Organ	Draft/ Revise	1.4	Revise jury instructions
4/20/2020	Larry Organ	Communication	0.1	Email to Tracey re jury instructions revisions
4/20/2020	Larry Organ	Communication	0.3	Communication with Bernard Alexander re settlement demand
4/20/2020	Larry Organ	Review/ Analyze	2	Review and analyze and draft objections to Defendant's proposed exhibits
4/20/2020	Larry Organ	Meet	0.3	Zoom meeting with Tracey et al re joint statement tasks including exhibit issue
4/20/2020	Larry Organ	Draft/ Revise	1.5	Further Revise Plaintiff's MILs
4/20/2020	Larry Organ	Draft/ Revise	0.3	Additional revisions to Plaintiff's MILs
4/20/2020	Larry Organ	Review/ Analyze	1.7	Begin reviewing Defendant's MILs as filed
4/21/2020	Larry Organ	Review/ Analyze	0.5	Additional Review of defense MILs
4/21/2020	Larry Organ	Communication	0.1	Phone call with Nav re Diaz timing
4/21/2020	Larry Organ	Research	1.5	Research re Defense MILs

Date	User	Activity	Time	Description
4/21/2020	Larry Organ	Communication	0.5	Phone conf. with Cimone re Defense MILs
4/22/2020	Larry Organ	Communication	0.4	Phone call with Cimone Nunley re Defense MILs
4/22/2020	Larry Organ	Communication	0.1	Email to Tracey Kennedy re contact information for Jeff Henry
4/22/2020	Larry Organ	Communication	0.1	Phone call with Sabrina re OCRing exhibits
4/22/2020	Larry Organ	Plan/ Prepare	6.4	Prepare for Trial -- Review Defense Exhibits and prepare objections and work product analysis of exhibits
4/22/2020	Larry Organ	Communication	0.1	Telephone call with Navruz Avloni and Cimone Nunley regarding jury instructions
4/23/2020	Larry Organ	Plan/ Prepare	0.9	Further review and analysis of Defendant's exhibits
4/23/2020	Larry Organ	Communication	0.2	Phone call with Cimone re MIL oppositions
4/23/2020	Larry Organ	Plan/ Prepare	1.8	Additional review of exhibits to check for duplicates and substantive differences if any between similar exhibits in Defendant's production and Plaintiff's
4/23/2020	Larry Organ	Plan/ Prepare	0.4	Prepare for Pretrial Conference - review latest changes to jury instructions
4/24/2020	Larry Organ	Meet	0.5	Zoom Meeting with Tracey et al re exhibits, jury instructions and joint statement - discussion of Agency and perhaps lack of need for 4 series
4/24/2020	Larry Organ	Communication	0.3	Phone call with Cimone and Bernard re division of labor
4/24/2020	Larry Organ	Communication	0.2	Phone call with Cimone re MILs and tasks
4/24/2020	Larry Organ	Draft/ Revise	1.1	Revise Joint Exhibit List with duplicates
4/24/2020	Larry Organ	Communication	0.1	Email to Tracey re Joint Exhibit List
4/24/2020	Larry Organ	Communication	0.1	Phone conf. with client re witness information
4/24/2020	Larry Organ	Communication	0.1	Email to Tracey re witness list
4/24/2020	Larry Organ	Draft/ Revise	1.5	Review and revise joint jury instructions
4/24/2020	Larry Organ	Communication	0.1	email to Bernard re jury instructions
4/24/2020	Larry Organ	Communication	0.1	Email from Tracey - review witness list - email response
4/25/2020	Larry Organ	Draft/ Revise	1.6	Revise Jury instructions and review proposed changes by Bernard
4/25/2020	Larry Organ	Communication	0.2	Phone conf. with Bernard re jury Instructions

Date	User	Activity	Time	Description
4/25/2020	Larry Organ	Communication	0.1	Email exchange with Team re Focus Group
4/25/2020	Larry Organ	Communication	0.1	email to Tracey Kennedy re Jury instructions
4/25/2020	Larry Organ	Draft/ Revise	4	Draft and revise MIL 4 opposition
4/25/2020	Larry Organ	Communication	0.1	Email to Bernard with MIL 4 opposition
4/26/2020	Larry Organ	Draft/ Revise	0.4	Review Bernard Alexander's edits to MIL 4 and make additional edits to put in final
4/26/2020	Larry Organ	Communication	0.7	Phone conf. with Cimone re MIL strategy and approach and cases
4/26/2020	Larry Organ	Draft/ Revise	2.2	Revise MIL 1 draft and research re same
4/26/2020	Larry Organ	Draft/ Revise	3.3	Review, research and revise joint statement
4/26/2020	Larry Organ	Communication	0.1	Email to Cimone re MIL 1
4/26/2020	Larry Organ	Communication	0.1	Email to Tracey Kennedy re Joint statement
4/27/2020	Larry Organ	Communication	0.2	Phone call with Cimone re contract theory issues
4/27/2020	Larry Organ	Communication	0.3	Meeting with Tracey re joint documents
4/27/2020	Larry Organ	Draft/ Revise	0.8	Review and revise jury instructions
4/27/2020	Larry Organ	Draft/ Revise	0.4	Review and revise witness list
4/27/2020	Larry Organ	Communication	0.1	Email to Sabrina re Jury Instruction document
4/27/2020	Larry Organ	Communication	0.1	Email to Tracey re Witness List
4/27/2020	Larry Organ	Draft/ Revise	1.2	Review and revise the Joint Statement
4/27/2020	Larry Organ	Communication	0.1	Email revised Joint statement to Tracey Kennedy
4/27/2020	Larry Organ	Review/ Analyze	1.7	Review and revise Joint Exhibit list - analyze defendant's designations and revise some of Plaintiff's designations
4/27/2020	Larry Organ	Draft/ Revise	1.1	Draft Voir Dire and review pleading for juror Questionnaire
4/27/2020	Larry Organ	Communication	0.1	Email to Tracey regarding Juror Questionnaire and email re voir dire questions
4/27/2020	Larry Organ	Review/ Analyze	0.4	Review jury instructions
4/27/2020	Larry Organ	Communication	0.1	Email to Tracey Kennedy re jury instructions

Date	User	Activity	Time	Description
4/27/2020	Larry Organ	Review/ Analyze	1	Review and revise witness list - compare with prior drafts and make edits and accept edits from OC
4/27/2020	Larry Organ	Communication	0.1	Email to OC re witness list
4/27/2020	Larry Organ	Communication	0.1	Email requesting latest versions of discovery and deposition designations
4/27/2020	Larry Organ	Draft/ Revise	1.8	Review and revise designations of discovery and depositions
4/27/2020	Larry Organ	Communication	0.1	Email to OC with all documents prepared to file
4/27/2020	Larry Organ	Communication	0.1	EMail from OC re discovery designations and email response thereto
4/27/2020	Larry Organ	Communication	0.1	Phone call with Sabrina re filing Pretrial conference documents
4/27/2020	Larry Organ	Communication	0.1	Follow up phone call with Sabrina re filing documents
4/27/2020	Larry Organ	Communication	0.1	Additional follow up phone call with Sabrina re filing documents
4/28/2020	Larry Organ	Plan/ Prepare	3.5	Work on in limine oppositions - review depositions of Annalisa Heisen and Erin Marconi re defendant's policies
4/28/2020	Larry Organ	Communication	0.3	Phone call with Cimone re MILs
4/28/2020	Larry Organ	Communication	0.1	Communication with Bernard re MILs
4/28/2020	Larry Organ	Draft/ Revise	4.8	Revise MIL opposition papers
4/29/2020	Larry Organ	Communication	0.8	Review proposed revised jury instruction 10.6 by Patricia Jeng and compare to old version and Model Instructions. Draft email re same and send
4/29/2020	Larry Organ	Communication	0.1	email to Tracey re filing under seal
4/29/2020	Larry Organ	Review/ Analyze	0.8	Review exhibits to Haines declaration re MILs
4/29/2020	Larry Organ	Communication	0.1	Phone call to Cimone re Defense exhibits to MILs
4/29/2020	Larry Organ	Communication	0.1	Phone call to Cimone re MIL brief
4/29/2020	Larry Organ	Review/ Analyze	0.2	Review and analyze court orders re filing documents
4/29/2020	Larry Organ	Communication	0.1	Phone call with Tracey Kennedy re filing documents under seal and court's orders re same
4/29/2020	Larry Organ	Communication	0.1	Follow up email to Tracey to inform her that we are filing our MILs not under seal
4/29/2020	Larry Organ	Communication	0.1	Phone call with Cimone re filing under seal and need to file MILs not under seal
4/29/2020	Larry Organ	Review/ Analyze	2.4	Review and analyze deposition testimony re Tesla's defenses

Date	User	Activity	Time	Description
4/29/2020	Larry Organ	Review/ Analyze	1.8	Review Defendant's MIL oppositions
4/30/2020	Larry Organ	Review/ Analyze	1.3	Review filed documents
4/30/2020	Larry Organ	Communication	0.2	Email from Patricia Jeng re jury instructions and response thereto
5/1/2020	Larry Organ	Communication	0.2	phone call with Cimone and Bernard re Illman email and demonstratives
5/1/2020	Larry Organ	Communication	0.1	Email from Bernard re response from Tracey Kennedy to mediation demand
5/1/2020	Larry Organ	Communication	0.1	communication to Judge Illman's clerk re mediation response by Tesla
5/4/2020	Larry Organ	Communication	0.5	phone call with Cimone re evidence issue, contract issue
5/4/2020	Larry Organ	Plan/ Prepare	2.5	Prepare for trial - review exhibits and create chart re importance or how we plan to use each document
5/4/2020	Larry Organ	Communication	0.1	Email exchange with Susan Haines re exhibit 3
5/4/2020	Larry Organ	Review/ Analyze	0.9	Review and analyze exhibit 3 and its unredacted portions and review court's order and declaration of Defense witness
5/4/2020	Larry Organ	Communication	0.1	Phone call with Cimone Nunley regarding state court case management statement
5/6/2020	Larry Organ	Communication	1	GoToMeeting session with Susan Haines and Cimone Nunley re redactions to exhibit 3 (Tesla Master Services Agreement with NextSource)
5/6/2020	Larry Organ	Communication	0.1	phone call with Cimone re next steps
5/6/2020	Larry Organ	Plan/ Prepare	1.5	Prepare for meeting with Susan Haines re Exhibit 3 - review redactions and declaration of Athina Martinez
5/7/2020	Larry Organ	Review/ Analyze	0.4	Analyze defendant's oppositions to MILs
5/7/2020	Larry Organ	Communication	0.5	Phone call with Cimone and Bernard re Pretrial Conference assignments
5/7/2020	Larry Organ	Communication	0.1	Email to Cimone and Bernard re assignments for Pretrial conference
5/8/2020	Larry Organ	Meet	0.7	Zoom meeting with Tracey Kennedy
5/8/2020	Larry Organ	Communication	0.1	Phone call with Bernard and Cimone re follow up to meeting
5/8/2020	Larry Organ	Communication	0.1	Phone call with Cimone Nunley and Bernard Alexander after meeting with defense counsel today
5/8/2020	Larry Organ	Communication	0.8	Discuss with Cimone Nunley oral arguments for Monday
5/8/2020	Larry Organ	Plan/ Prepare	6	Prepare for Pretrial conference
5/9/2020	Larry Organ	Plan/ Prepare	5	Prepare for pretrial conference - review Pretrial conference materials - review cases on jury instructions

Date	User	Activity	Time	Description
5/10/2020	Larry Organ	Plan/ Prepare	8.5	Prepare for pretrial conference - review pretrial conf. materials and review MILs as well as relevant case law cited therein
5/11/2020	Larry Organ	Appearance/ Attend	1.4	Appear for Pretrial conference
5/11/2020	Larry Organ	Communication	0.4	Phone Conf with Bernard and Cimone after pretrial conference
5/11/2020	Larry Organ	Communication	0.9	Phone conference with Cimone going over argument
5/11/2020	Larry Organ	Plan/ Prepare	2	Prepare for Pretrial conference
5/14/2020	Larry Organ	Communication	0.2	Phone call with Bernard re mediation
5/14/2020	Larry Organ	Communication	0.1	Email from Judge Illman's clerk
5/14/2020	Larry Organ	Communication	0.3	Phone call with Judge Illman re mediation
5/14/2020	Larry Organ	Communication	0.3	Telephone conference with Cimone Nunley regarding MILs
5/15/2020	Larry Organ	Communication	0.1	Notice from Court re trial postponement to September 28
5/15/2020	Larry Organ	Communication	0.2	communication with Cimone re trial continuance
5/17/2020	Larry Organ	Communication	0.1	Email to Harry Plotkin re trial continuance
5/17/2020	Larry Organ	Communication	0.1	Email to Amy Oppenheimer re trial continuance
5/17/2020	Larry Organ	Communication	0.1	Email to Charles Mahla re trial continuance
5/17/2020	Larry Organ	Communication	0.1	Email to Anthony Reading re trial continuance
5/17/2020	Larry Organ	Communication	0.1	Email to Bernard re attorney's fees and costs to relay to Judge Illman
5/18/2020	Larry Organ	Communication	0.1	email exchange with Gustin Ham (Alexander firm) re costs and attorney's fees
5/18/2020	Larry Organ	Communication	0.1	Email to court clerk Gloria Knudson with rough attorney's fees and costs as of this date
5/19/2020	Larry Organ	Communication	0.2	Telephone conference with Cimone Nunley regarding case status and next steps
5/22/2020	Larry Organ	Meet	0.7	communication with Bernard, Cimone, Nav re MIL rulings and witnesses and opening and closing
5/22/2020	Larry Organ	Review/ Analyze	0.2	Review MILs
6/10/2020	Larry Organ	Draft/ Revise	1.8	Draft Closing argument and review race related materials for closing
6/10/2020	Larry Organ	Review/ Analyze	0.3	Review trial guidelines for federal judiciary jury trials



Date	User	Activity	Time	Description
6/16/2020	Larry Organ	Plan/ Prepare	6	Prepare for strategy meeting by reviewing orders and evidence in case to develop case themes and assess evidence in light of motions in limine rulings
6/16/2020	Larry Organ	Plan/ Prepare	1.6	Brainstorm with Susan for themes
6/16/2020	Larry Organ	Review/ Analyze	1.5	Review and analyze latest supreme court case on discrimination
6/17/2020	Larry Organ	Plan/ Prepare	2.5	More review and preparation for meeting with Harry, Bernard, Cimone and Susan
6/17/2020	Larry Organ	Meet	1.6	Meet with Harry, Bernard, Cimone, Susan and Sabrina and intern re case themes and strategy
6/17/2020	Larry Organ	Communication	0.1	Email from Harry Plotkin re focus group
6/17/2020	Larry Organ	Communication	0.1	Email to Bernard re focus group
6/17/2020	Larry Organ	Communication	0.1	Email from Bernard re focus group
6/17/2020	Larry Organ	Draft/ Revise	2.5	Witness order and assignments chart
6/25/2020	Larry Organ	Communication	0.1	Email exchange re focus group dates
6/25/2020	Larry Organ	Communication	0.2	Review email from Sabrina and respond re new witness Robin Aylsworth
7/22/2020	Larry Organ	Plan/ Prepare	4.3	Prepare for trial - prepare witness examinations
7/25/2020	Larry Organ	Draft/ Revise	2.6	Witness examinations
7/29/2020	Larry Organ	Communication	0.7	Communication with Mika Hilaire and Sabrina and Susan and Cimone and Bernard re focus group
7/29/2020	Larry Organ	Review/ Analyze	1	Review materials for phone conference with Mika
7/29/2020	Larry Organ	Draft/ Revise	0.6	Work on demonstratives re trial prep
7/30/2020	Larry Organ	Plan/ Prepare	3	Prepare for trial - defense demonstratives for focus group
7/30/2020	Larry Organ	Plan/ Prepare	4.5	Prepare for trial - witness examination of Ed Romero
7/31/2020	Larry Organ	Plan/ Prepare	4.3	Prepare for trial - prepare examinations
7/31/2020	Larry Organ	Draft/ Revise	2.1	Revise demonstrative exhibits for focus group
8/1/2020	Larry Organ	Plan/ Prepare	3.6	Prepare for trial - witness examinations
8/3/2020	Larry Organ	Draft/ Revise	0.9	prepare jury instructions for focus group
8/3/2020	Larry Organ	Draft/ Revise	2.5	Revise demonstrative exhibits for focus group

Date	User	Activity	Time	Description
8/5/2020	Larry Organ	Communication	0.1	Call with Navruz Avloni regarding focus group
8/6/2020	Larry Organ	Plan/ Prepare	2.8	Prepare for meeting with Mika and Harry
8/6/2020	Larry Organ	Meet	1.3	Meet with Mika, Harry, Susan, Cimone, Nav
8/7/2020	Larry Organ	Plan/ Prepare	6	Review exhibits and testimony and revise PowerPoint slides for focus group
8/7/2020	Larry Organ	Communication	0.1	Telephone call with Cimone Nunley regarding deposition videos
8/8/2020	Larry Organ	Draft/ Revise	4.5	Draft witness examination for Tom Kawasaki
8/10/2020	Larry Organ	Plan/ Prepare	3	Prepare for trial - witness examination - Lamar Patterson
8/11/2020	Larry Organ	Plan/ Prepare	1.2	Prepare for Focus Group - Meet with Bernard and Team
8/11/2020	Larry Organ	Plan/ Prepare	0.9	Prepare for focus group - Review Owen Testimony to pull segments for video presentation to focus group
8/11/2020	Larry Organ	Communication	0.1	Email Diaz depo cites to Bernard for pulling for focus group
8/11/2020	Larry Organ	Communication	0.1	Telephone call with Cimone Nunley regarding focus group preparation
8/13/2020	Larry Organ	Plan/ Prepare	4.5	Prepare for focus group - review materials and edit powerpoint
8/14/2020	Larry Organ	Meet	0.5	Meet with Cimone, Sabrina and Susan re Focus Group
8/14/2020	Larry Organ	Communication	0.1	Phone call with Harry re focus group
8/14/2020	Larry Organ	Communication	0.2	Communication with team re juror questionnaire and focus group
8/14/2020	Larry Organ	Review/ Analyze	0.2	Review juror questionnaire
8/14/2020	Larry Organ	Plan/ Prepare	7.7	Prepare for trial - prepare for focus group tomorrow - revise materials and review documents for potential use
8/15/2020	Larry Organ	Plan/ Prepare	5.1	Prepare for trial -- attend focus group
8/15/2020	Larry Organ	Meet	0.9	Meet with Focus Group team to debrief
8/17/2020	Larry Organ	Communication	1.7	Phone conf. with Bernard Alexander re focus group, trial strategy and witness examinations and order
8/17/2020	Larry Organ	Communication	0.2	Email exchanges for trial team re meeting this week re strategy
8/17/2020	Larry Organ	Plan/ Prepare	6.5	Prepare for trial - review witness testimony and exhibits
8/17/2020	Larry Organ	Communication	0.1	Telephone conference with Navruz Avloni regarding trial strategy and the focus group

Date	User	Activity	Time	Description
8/18/2020	Larry Organ	Communication	0.1	email to Cimone re exhibits
8/18/2020	Larry Organ	Communication	0.1	Phone call with Cimone re exhibits
8/19/2020	Larry Organ	Meet	1.6	Meet with Bernard, Cimone, Susan, Nav, Sabrina and Harry to discuss trial themes and strategy in light of focus group information
8/19/2020	Larry Organ	Plan/ Prepare	2.5	Prepare for trial - review testimony and exhibits
8/20/2020	Larry Organ	Plan/ Prepare	0.8	prepare for discussions of case
8/21/2020	Larry Organ	Plan/ Prepare	5	Prepare for trial - witness examinations and prepare for prep session with client on Monday
8/21/2020	Larry Organ	Draft/ Revise	1.1	Revise demonstrative exhibits for trial
8/21/2020	Larry Organ	Draft/ Revise	0.8	Review and edit Juror Questionnaire re covid issues
8/21/2020	Larry Organ	Communication	0.1	Email to Tracey Kennedy re edits to juror questionnaire
8/23/2020	Larry Organ	Review/ Analyze	3.6	Review and Analyze exhibits used by Defendant during deposition
8/24/2020	Larry Organ	Communication	0.1	E-message from Court re vacated FSC and setting of CMC
8/24/2020	Larry Organ	Meet	0.5	Meet with client and Bernard to discuss trial continuance and steps to get ready for trial
8/24/2020	Larry Organ	Plan/ Prepare	0.7	Prepare for trial - review an edit demonstratives for trial
8/28/2020	Larry Organ	Draft/ Revise	1.7	Revise Demonstrative Exhibits
8/31/2020	Larry Organ	Draft/ Revise	0.8	Revise Demonstrative exhibits
9/1/2020	Larry Organ	Appearance/ Attend	0.2	Appear for CMC with Judge and Cimone, Bernard, Tracey Kennedy, Susan Haines - Judge put over trial to Jan 19 with CMC on Dec 15 at 2:00 pm -- Judge said they are bringing in jurors in groups of 20 spread throughout the courtroom - Bernard raised issue of jury consultant
9/1/2020	Larry Organ	Communication	0.1	Follow up call with Bernard and Cimone re new schedule
9/1/2020	Larry Organ	Communication	0.1	Follow up call with Cimone re tasks
9/1/2020	Larry Organ	Communication	0.1	communication with Harry Plotkin re new trial date
9/1/2020	Larry Organ	Communication	0.1	communication with Charles Mahla re new trial date
9/8/2020	Larry Organ	Communication	0.1	Telephone conference with Cimone Nunley regarding my availability for the mandatory settlement conference

Date	User	Activity	Time	Description
9/10/2020	Larry Organ	Communication	0.1	Phone call with Cimone re settlement conf. statement
9/23/2020	Larry Organ	Communication	0.1	Phone conf. with Cimone, Sabrina and Nav re settlement conference
9/24/2020	Larry Organ	Communication	0.2	Phone call with Owen Diaz re status and MSC on Nov. 13 at 10:00 am
10/23/2020	Larry Organ	Meet	0.9	Strategy meeting
11/2/2020	Larry Organ	Meet	1	Meet with Bernard, Cimone, Nav and Susan re strategy for trial and settlement conference
11/2/2020	Larry Organ	Communication	0.2	Text messages to client re mandatory settlement conference
11/12/2020	Larry Organ	Communication	0.4	Phone call with Nav re trial prep
11/12/2020	Larry Organ	Communication	0.1	Call with Sabrina re trial
11/13/2020	Larry Organ	Appearance/ Attend	1.3	Settlement conference - Mediator's proposal
11/13/2020	Larry Organ	Communication	0.7	Telephone conf. with client and Bernard and Cimone re mediator's proposal and then conversation with Bernard and Cimone re strategy
11/20/2020	Larry Organ	Communication	0.2	Telephone call with Cimone Nunley to gather the email address for settlement communications for Judge Illman
11/28/2020	Larry Organ	Communication	0.2	Email to Tracey Kennedy re exhibit designations, exhibit tabs, witness information
11/28/2020	Larry Organ	Communication	0.1	Phone call with Cimone re exhibits
12/2/2020	Larry Organ	Communication	0.2	Telephone conference with Cimone Nunley
12/7/2020	Larry Organ	Communication	0.1	Phone call with Cimone re exhibits
12/7/2020	Larry Organ	Review/ Analyze	1.4	Exhibit lists and exhibits
12/7/2020	Larry Organ	Meet	0.8	Meet with Tracey Kennedy, Susan Haines, and Cimone Nunley re trial issues
12/7/2020	Larry Organ	Communication	0.1	Phone call with Cimone re witness issues
12/8/2020	Larry Organ	Communication	0.3	Telephone conference with Bernard Alexander and Cimone Nunley regarding trial continuance
12/14/2020	Larry Organ	Plan/ Prepare	3	Prepare for CMC
12/15/2020	Larry Organ	Plan/ Prepare	2.5	Prepare for CMC - review Jury instructions and legal authority therein and legal research re Comcast decision
12/15/2020	Larry Organ	Appearance/ Attend	0.5	Appear for CMC - Trial reset to April 26
12/15/2020	Larry Organ	Communication	0.1	Phone conf. with Bernard and Cimone re CMC after hearing

Date	User	Activity	Time	Description
12/15/2020	Larry Organ	Appearance/ Attend	0.5	Appear for Settlement Conference
12/15/2020	Larry Organ	Communication	0.1	Phone conf. with Bernard and Cimone after settlement conference
12/15/2020	Larry Organ	Communication	0.1	Email to staff regarding trial continuance
2/11/2021	Larry Organ	Communication	0.2	Phone call with Cimone re trial date
2/16/2021	Larry Organ	Communication	0.4	Meet with OC and co-counsel re Trial dates
2/18/2021	Larry Organ	Communication	0.2	Phone conf. with client re continuance
2/24/2021	Larry Organ	Review/ Analyze	0.7	Review Owen Diaz testimony in Lambert arbitration and compare to depositions
2/27/2021	Larry Organ	Plan/ Prepare	1.8	Work on Annalisa Heisen examination
3/2/2021	Larry Organ	Communication	0.1	Order from court continuing trial
3/2/2021	Larry Organ	Communication	0.1	Emails from experts confirming change of trial date and availability
3/2/2021	Larry Organ	Communication	0.1	Email from court re trial continuance
3/2/2021	Larry Organ	Communication	0.1	Phone call with Cimone re trial continuance and settlement conference
3/2/2021	Larry Organ	Communication	0.1	Review emails to experts re availability for new trial date
4/15/2021	Larry Organ	Communication	0.2	Phone conf. with Owen re case status
6/15/2021	Larry Organ	Appearance/ Attend	0.2	Attend status conference with Judge Illman
6/15/2021	Larry Organ	Communication	0.2	Post settlement conference call with Bernard Alexander and Cimone Nunley regarding next steps
6/22/2021	Larry Organ	Meet	0.8	Meet with Bernard, Cimone and Sabrina re preparation for trial and task lists
6/27/2021	Larry Organ	Communication	0.1	email exchange with client re meeting
6/27/2021	Larry Organ	Communication	0.2	Email to Sabrina re review of deposition transcripts
7/16/2021	Larry Organ	Meet	1.1	Zoom meeting with Bernard and Cimone re opening statement
7/16/2021	Larry Organ	Plan/ Prepare	1.4	Prepare for Meeting with Owen Diaz
7/17/2021	Larry Organ	Plan/ Prepare	0.8	Prepare for meeting with Owen Diaz
7/17/2021	Larry Organ	Meet	1.7	Meet with Owen Diaz via Zoom re prepare for trial

Date	User	Activity	Time	Description
7/17/2021	Larry Organ	Communication	0.1	Email to Sabrina re exhibits and deposition transcript
7/19/2021	Larry Organ	Meet	1.7	Meet with Owen Diaz and team to discuss case
7/19/2021	Larry Organ	Communication	0.3	Phone conf. with Bernard, Cimone and Harry Plotkin re focus group
7/19/2021	Larry Organ	Communication	0.3	Phone call with Bernard re focus group
7/27/2021	Larry Organ	Communication	0.1	Communication with Harry Plotkin re focus group
7/27/2021	Larry Organ	Communication	0.3	Phone conf. with Harry Plotkin, Cimone Nunley and Bernard Alexander
8/4/2021	Larry Organ	Communication	0.4	Email exchange with Harry Plotkin and co-counsel re focus group
8/6/2021	Larry Organ	Draft/ Revise	5.5	Review trial materials and work on script for new focus group
8/7/2021	Larry Organ	Communication	0.1	communication with client re trial issues
8/8/2021	Larry Organ	Communication	0.1	Communication with Tom Kawasaki - He is working in SF as a plumber and is available to testify
8/9/2021	Larry Organ	Plan/ Prepare	3.8	Prepare for CMC - review exhibits, jury instructions, and witnesses
8/10/2021	Larry Organ	Plan/ Prepare	3.1	Prepare for Case Management Conference/Trial Readiness - review jury instructions and legal research re same and review exhibits
8/10/2021	Larry Organ	Appearance/ Attend	0.1	Appear for Case Management/Trial Readiness Conference - We are 5th on list -- trial may be continued to October 12 - Patti Jeng will check with Tracey to see her availability
8/10/2021	Larry Organ	Communication	0.1	Conversation with client re trial date
8/16/2021	Larry Organ	Meet	4.2	Meet with trial team for trial prep
8/16/2021	Larry Organ	Communication	0.1	Email to Bernard Alexander re trial prep issues
8/16/2021	Larry Organ	Communication	0.1	Email to Harry Plotkin re focus group
8/18/2021	Larry Organ	Meet	1.4	Meet with Harry Plotkin re jury selection and focus groups (.6) and continue meeting with Bernard, Cimone and Sabrina re opening statement, witness examinations, and exhibits (.7)
8/21/2021	Larry Organ	Plan/ Prepare	2.4	Prepare for trial by reviewing exhibits
8/22/2021	Larry Organ	Plan/ Prepare	3.1	Prepare for trial by reviewing and organizing exhibits for impeachment purposes
8/24/2021	Larry Organ	Communication	0.1	Call with Cimone Nunley regarding focus group logistics
8/27/2021	Larry Organ	Communication	0.3	Call with Cimone Nunley regarding email from defense counsel Patricia Jeng

Date	User	Activity	Time	Description
8/30/2021	Larry Organ	Plan/ Prepare	7.6	Work on witness examinations for trial -- Annalisa Heisen & Erin Marconi
9/2/2021	Larry Organ	Communication	0.2	Call with Cimone Nunley regarding outstanding tasks for focus group
9/3/2021	Larry Organ	Plan/ Prepare	6.7	prepare for focus group
9/3/2021	Larry Organ	Communication	0.4	Call with Cimone Nunley regarding logistics for September 5 focus group
9/3/2021	Larry Organ	Meet	0.1	Meet with Cimone Nunley and Sabrina Grislis to discuss the focus group
9/4/2021	Larry Organ	Plan/ Prepare	13.5	Prepare for focus group - edit script and demonstratives
9/5/2021	Larry Organ	Plan/ Prepare	2	Prepare for focus group prior to focus group
9/5/2021	Larry Organ	Appearance/ Attend	4.1	Attend focus group - present plaintiff's case - Bernard presented Tesla in morning and Nav in the afternoon
9/5/2021	Larry Organ	Meet	0.4	Meet with Cimone Nunley, Navruz Avloni, Sabrina Grislis, and Susan Organ after focus groups to debrief
9/5/2021	Larry Organ	Plan/ Prepare	1	Prepare for panel 2 focus group in between panels
9/7/2021	Larry Organ	Appearance/ Attend	0.2	Appear for status conference
9/7/2021	Larry Organ	Communication	0.4	communication with Bernard and Cimone
9/7/2021	Larry Organ	Communication	0.3	Phone conf. with Cimone re trial tasks
9/7/2021	Larry Organ	Communication	0.2	Email to Stephanie Limbaugh re unreceived email
9/7/2021	Larry Organ	Communication	0.1	Additional email exchange with Stephanie Limbaugh
9/8/2021	Larry Organ	Plan/ Prepare	6.1	Prepare for trial prep session with Owen -- review deposition testimony
9/9/2021	Larry Organ	Meet	4.9	Meet with client, Bernard, Cimone, and Susan to prepare for trial
9/9/2021	Larry Organ	Communication	0.3	Meet with Bernard Alexander and Cimone Nunley regarding trial tasks
9/9/2021	Larry Organ	Plan/ Prepare	1.5	Review trial exhibits produced by Defendant with trial stickers
9/9/2021	Larry Organ	Communication	0.1	Phone conf. with client re trial date
9/9/2021	Larry Organ	Review/ Analyze	5.6	Review deposition transcript of Amy Oppenheimer and annotate deposition
9/9/2021	Larry Organ	Communication	0.3	email exchange with expert witness Amy Oppenheimer
9/9/2021	Larry Organ	Communication	0.1	Discussion with Navruz Avloni regarding urgent trial tasks

Date	User	Activity	Time	Description
9/10/2021	Larry Organ	Plan/ Prepare	1.3	Meet with Team to discuss strategy and deadlines
9/10/2021	Larry Organ	Communication	0.2	Phone conf. with Charles Mahla re expert testimony
9/10/2021	Larry Organ	Communication	0.1	Email to OC re remote testimony for Oppenheimer and Mahla
9/10/2021	Larry Organ	Plan/ Prepare	7.7	Prepare for questioning of Ed Romero - review testimony and exhibits
9/10/2021	Larry Organ	Review/ Analyze	1.9	Start reviewing exhibits re objections for meet and confer
9/10/2021	Larry Organ	Communication	0.4	Call with Cimone Nunley regarding trial logistics
9/11/2021	Larry Organ	Communication	0.1	Email to Tracey Kennedy re Nigel Jones testimony
9/11/2021	Larry Organ	Plan/ Prepare	8.8	Prepare for trial - review deposition testimony of Ed Romero and related documents and impeachment
9/11/2021	Larry Organ	Plan/ Prepare	5.7	Review Tom Kawasaki evidence for trial preparation
9/12/2021	Larry Organ	Communication	0.1	Follow up response to Tracey Kennedy email re Nigel Jones testimony
9/12/2021	Larry Organ	Plan/ Prepare	1.6	Meet with Tom Kawasaki via Zoom to discuss his testimony
9/12/2021	Larry Organ	Plan/ Prepare	3.7	Prepare for meeting with Tom Kawasaki by reviewing materials related to his deposition
9/12/2021	Larry Organ	Communication	0.1	Follow up email exchange with Tracey Kennedy re giving 2 days notice of witnesses by zoom
9/12/2021	Larry Organ	Communication	0.1	Email exchange with Patti Jeng re witness estimates
9/12/2021	Larry Organ	Communication	0.1	Email to Jeng re original copies of exhibits
9/12/2021	Larry Organ	Plan/ Prepare	7.9	Prepare for examination of Romero and Kawasaki
9/13/2021	Larry Organ	Plan/ Prepare	4.9	Meet with Owen to prepare him for his trial testimony
9/13/2021	Larry Organ	Communication	0.1	Email from Jeng re updated witness list
9/13/2021	Larry Organ	Draft/ Revise	1.4	Revise Joint Witness List Time Estimates
9/13/2021	Larry Organ	Plan/ Prepare	7.2	Prepare for trial - complete drafting examination of Kawasaki
9/14/2021	Larry Organ	Meet	0.8	Zoom meeting with Bernard and Lamar Patterson
9/14/2021	Larry Organ	Communication	0.3	Research and Email to Patti Jeng re appearance of Ed Romero based on prior agreement
9/14/2021	Larry Organ	Plan/ Prepare	5.8	Prepare for trial - review exhibits with Susan Organ to review and revise stipulations and determine use of exhibits



Date	User	Activity	Time	Description
9/14/2021	Larry Organ	Plan/ Prepare	2.3	prepare for meeting with Lamar Patterson by reviewing transcript, exhibits and plan examination
9/14/2021	Larry Organ	Communication	0.2	Email exchange with OC re witness lists
9/14/2021	Larry Organ	Review/ Analyze	3.3	Review testimony of Ed Romero and edit examination of him
9/14/2021	Larry Organ	Communication	0.1	Email to Court Reporter re dailies for trial
9/15/2021	Larry Organ	Review/ Analyze	5.5	Review exhibits and proposed designations
9/15/2021	Larry Organ	Meet	0.4	Meet with Cimone re designations
9/15/2021	Larry Organ	Communication	0.3	Discussion with Cimone re discovery designations
9/15/2021	Larry Organ	Review/ Analyze	0.9	Review discovery designations
9/15/2021	Larry Organ	Meet	1	Meet with Bernard, Susan and Cimone re Testimony and other strategy issues
9/15/2021	Larry Organ	Communication	0.5	Communication with Sabrina re exhibits and trial matters
9/15/2021	Larry Organ	Communication	0.2	Email exchange with Bernard re witness and exhibit
9/15/2021	Larry Organ	Communication	0.1	Email to Bernard re exhibit
9/15/2021	Larry Organ	Communication	0.1	Emails to Bernard re multiple witnesses sending him my notes on the witnesses
9/15/2021	Larry Organ	Communication	0.1	Email exchange with Patti Jeng re Heisen and Romero
9/15/2021	Larry Organ	Communication	0.1	Communication with Cimone re discovery fact for trial
9/15/2021	Larry Organ	Communication	0.2	Phone conf. with Cimone and Susan re Veronica Martinez and and Jacquelin Delgado testimony
9/15/2021	Larry Organ	Communication	0.5	Phone conf. with Cimone and Susan re follow up conversation re Veronica Martinez and and Jacquelin Delgado testimony
9/15/2021	Larry Organ	Review/ Analyze	3.4	Review Jackelin Delgado and Veronica Martinez and Demetria and La Drea testimony
9/16/2021	Larry Organ	Review/ Analyze	0.7	Review motions in limine and legal basis for them -- analyze evidence limitations
9/16/2021	Larry Organ	Meet	1	Meet with Bernard Alexander, Cimone Nunley and Susan Organ re witness testimony, witness order and other witness issues
9/16/2021	Larry Organ	Plan/ Prepare	2.9	Prepare for Ed Romero Examination
9/16/2021	Larry Organ	Plan/ Prepare	8.7	Plan and prepare for Owen Diaz cross examination
9/17/2021	Larry Organ	Plan/ Prepare	3.8	Meet with Owen to prepare him for testifying. Bernard Alexander joined for part of this meeting.

Date	User	Activity	Time	Description
9/18/2021	Larry Organ	Meet	1.4	Meet via Zoom with Bernard, Susan, and Michael Wheeler
9/18/2021	Larry Organ	Communication	0.2	Phone conf. with Bernard re opening statement and supplemental pretrial conference statement
9/18/2021	Larry Organ	Draft/ Revise	1.3	Revise the supplemental pretrial conference statement - review criminal charges and plea for Demetric and review orders of the court
9/18/2021	Larry Organ	Communication	0.1	Email to Patti Jeng re potential compromise on Demetric felonies
9/18/2021	Larry Organ	Communication	0.3	Phone call with process server re Erin Marconi
9/18/2021	Larry Organ	Review/ Analyze	1.5	Review testimony of Andres Donet for examination at trial
9/18/2021	Larry Organ	Review/ Analyze	8.9	Review Owen Diaz deposition and prepare mock cross examination of Owen based on the deposition testimony
9/19/2021	Larry Organ	Communication	0.5	communication with Nav re outline for Amy Oppenheimer examination
9/19/2021	Larry Organ	Plan/ Prepare	1.5	Prepare for trial with Bernard and Susan and Cimone - discuss opening demonstratives
9/19/2021	Larry Organ	Plan/ Prepare	1.8	Prepare for trial - revise Joint Further Pretrial Conference Statement
9/19/2021	Larry Organ	Plan/ Prepare	1	Meet with Tom Kawasaki to prepare him for his trial testimony
9/19/2021	Larry Organ	Plan/ Prepare	3.5	Prepare for trial - meet with Owen Diaz
9/19/2021	Larry Organ	Communication	0.1	Email to OC re Joint Further Statement
9/19/2021	Larry Organ	Communication	0.3	Phone conf. with Bernard re McGinn Testimony and fact relating to contract
9/19/2021	Larry Organ	Review/ Analyze	2.6	Review Kevin McGinn testimony for use at trial -- reduce volume
9/19/2021	Larry Organ	Draft/ Revise	0.1	Revise further Pretrial Conf. Statement
9/19/2021	Larry Organ	Communication	0.1	Email to OC with additional edits to further pretrial conf. statement
9/19/2021	Larry Organ	Communication	0.1	discussion with Sabrina re revised McGinn designations
9/19/2021	Larry Organ	Communication	0.1	Email to Sabrina re McGinn testimony
9/19/2021	Larry Organ	Plan/ Prepare	2.5	Prepare for trial - review and organize exhibits
9/20/2021	Larry Organ	Draft/ Revise	0.3	Review Revised Further Pretrial Conference statement and propose additional edits
9/20/2021	Larry Organ	Communication	0.1	email exchange with Patti Jeng re Further pretrial conference statement
9/20/2021	Larry Organ	Communication	0.2	Phone conf. with Cimone re verdict form and jury instructions

Date	User	Activity	Time	Description
9/20/2021	Larry Organ	Review/ Analyze	0.9	Review and revise McGinn designations
9/20/2021	Larry Organ	Communication	0.1	Email to Patti Jeng re McGinn revised designations
9/20/2021	Larry Organ	Communication	0.2	email exchanges and revisions to Further Pretrial Conference Statement documents
9/20/2021	Larry Organ	Draft/ Revise	0.2	Additional changes and email exchanges re further pretrial conference statement changes
9/20/2021	Larry Organ	Communication	0.1	Email from Tracey Kennedy re McGinn and two proposed additions
9/20/2021	Larry Organ	Review/ Analyze	0.1	Review changes suggested by Kennedy to McGinn
9/20/2021	Larry Organ	Communication	0.1	email response to Kennedy re McGinn
9/20/2021	Larry Organ	Communication	0.1	Discuss McGinn changes and filing of changes
9/20/2021	Larry Organ	Review/ Analyze	0.2	Analyze additional demonstratives for trial
9/20/2021	Larry Organ	Draft/ Revise	0.7	revise examination of Amy Oppenheimer
9/20/2021	Larry Organ	Review/ Analyze	0.8	Review Opening statement and make suggestions
9/20/2021	Larry Organ	Plan/ Prepare	1.5	Plan and prepare for DelaGrande examination
9/20/2021	Larry Organ	Plan/ Prepare	6.1	Plan and prepare for Romero examination
9/21/2021	Larry Organ	Plan/ Prepare	0.3	Prepare Amy Oppenheimer for her deposition
9/21/2021	Larry Organ	Plan/ Prepare	1.6	Prepare for examination of Annalisa Heisen
9/21/2021	Larry Organ	Appearance/ Attend	1	Appear for Final Pretrial Conference with Bernard, Cimone, and Tracey Kennedy, Susan Haines, & Patricia Jeng - prelim. rulings on Jury Instructions, request for briefing on matters, Me Too evidence limited to during time of Plaintiff
9/21/2021	Larry Organ	Communication	0.9	Phone conf. with Cimone, Nav and Bernard re strategy
9/21/2021	Larry Organ	Review/ Analyze	0.6	Review and analyze outline for Oppenheimer
9/21/2021	Larry Organ	Communication	0.3	Phone conf. with Harry Plotkin re jury selection
9/21/2021	Larry Organ	Communication	0.1	Communication with Bernard and Harry re jury selection
9/21/2021	Larry Organ	Communication	0.3	Meet with Cimone re strategy
9/21/2021	Larry Organ	Communication	0.2	Communication with Nav re Amy Oppenheimer testimony

Date	User	Activity	Time	Description
9/21/2021	Larry Organ	Review/ Analyze	2.4	Review Depo designations of Demetric Di-Az and put together a revised list of those to use at trial. Draft into a table for submission to the court and OC
9/21/2021	Larry Organ	Review/ Analyze	1.8	Review and analyze and begin list of designations for Erin Marconi
9/21/2021	Larry Organ	Review/ Analyze	3.3	Additional preparation for Romero cross
9/21/2021	Larry Organ	Communication	0.1	Email to co-counsel for comments re Demetric testimony
9/22/2021	Larry Organ	Plan/ Prepare	4.6	Prepare for trial - Romero examination and document review
9/22/2021	Larry Organ	Meet	1.6	Practice opening statement with Bernard and CCRLG Team
9/22/2021	Larry Organ	Draft/ Revise	1.3	Tweak and revise demonstratives for exchange
9/22/2021	Larry Organ	Review/ Analyze	1.3	Review and analyze demonstrative exhibits of defendant
9/22/2021	Larry Organ	Communication	0.1	Email to OC re objections to their demonstrative
9/22/2021	Larry Organ	Review/ Analyze	0.5	Review Demetric testimony
9/22/2021	Larry Organ	Draft/ Revise	2.5	Revise Ed Romero examination <sup>2.5</sup>
9/22/2021	Larry Organ	Review/ Analyze	2.4	Review and analyze jurors
9/23/2021	Larry Organ	Communication	0.1	Phone conf. with Owen re declaraton
9/23/2021	Larry Organ	Draft/ Revise	0.1	Revise declaration for Demetric availability
9/23/2021	Larry Organ	Communication	0.1	Email to OC re objection to demonstrative
9/23/2021	Larry Organ	Draft/ Revise	0.7	Draft objection to Defendant Demonstrative
9/23/2021	Larry Organ	Plan/ Prepare	3.8	Prepare for voir dire -- Meet with team and review candidates and rank them
9/23/2021	Larry Organ	Plan/ Prepare	2.6	Review witnesses and rework order of witnesses and examine what points we are getting from each witness
9/23/2021	Larry Organ	Communication	0.2	Email to Tracey re witnesses for next week
9/23/2021	Larry Organ	Plan/ Prepare	4.7	Review Demetric designations and testimony and video
9/23/2021	Larry Organ	Plan/ Prepare	1.9	Prepare for Ed Romero examination
9/23/2021	Larry Organ	Review/ Analyze	0.2	Review Tesla Briefing on use of discovery responses
9/23/2021	Larry Organ	Review/ Analyze	0.1	Review Plaintiff's response to defendant's objections to use of third party discovery responses

Date	User	Activity	Time	Description
9/23/2021	Larry Organ	Meet	0.6	Meet with Harry Plotkin, Bernard Alexander, Navruz Avloni, and Cimone Nunley regarding jury selection and instructions
9/23/2021	Larry Organ	Other	2.3	Drop off supplies and test technology at the Northern District Courthouse. Travel to and from San Francisco
9/24/2021	Larry Organ	Appearance/ Attend	7.2	Appear at Jury Selection and travel to and from San Francisco from Office in Marin
9/24/2021	Larry Organ	Communication	0.2	Phone call with Owen Diaz after hearing
9/24/2021	Larry Organ	Meet	1.5	Meet with Bernard re jury selection and trial strategy
9/24/2021	Larry Organ	Review/ Analyze	0.5	Review matters researched by Julianne and respond to her draft
9/24/2021	Larry Organ	Meet	0.3	Meet with Cimone and Bernard re DeLeon Testimony
9/24/2021	Larry Organ	Meet	0.5	Meet with Susan Organ re Marconi testimony
9/24/2021	Larry Organ	Communication	0.4	Meet with Sabrina and Susan re demonstrative exhibits
9/24/2021	Larry Organ	Communication	0.1	Email to Tracy re Tuesday witnesses
9/24/2021	Larry Organ	Communication	0.3	Additional discussion with Bernard and Cimone re witnesses and witness order
9/24/2021	Larry Organ	Communication	0.1	Telephone call with Julianne Stanford regarding brief on admissibility of Demetric Di-az's testimony
9/24/2021	Larry Organ	Communication	0.1	Telephone conference with Julianne Stanford regarding Kevin McGinn's testimony
9/25/2021	Larry Organ	Plan/ Prepare	5.1	Prepare for trial - review Marconi deposition and determine which excerpts to use
9/25/2021	Larry Organ	Communication	0.1	Email exchange with Tracey Kennedy re witnesses
9/25/2021	Larry Organ	Communication	0.1	Email exchange with OC re Erin Marconi
9/25/2021	Larry Organ	Communication	0.7	Meeting with Amy Oppenheimer
9/25/2021	Larry Organ	Plan/ Prepare	1.6	Work with Bernard to refine opening statement
9/25/2021	Larry Organ	Plan/ Prepare	2	Practice Opening Statement with Team and commentary for refining
9/25/2021	Larry Organ	Meet	4	Meet with Owen to prepare for trial
9/25/2021	Larry Organ	Communication	0.1	email to Tracey re designations for Marconi
9/25/2021	Larry Organ	Plan/ Prepare	2	Additional designations for Marconi
9/25/2021	Larry Organ	Meet	0.7	Meet with Amy Oppenheimer to prepare for trial with Navruz Avloni

Date	User	Activity	Time	Description
9/26/2021	Larry Organ	Review/ Analyze	0.5	Review and analyze expert demonstratives
9/26/2021	Larry Organ	Plan/ Prepare	0.8	Video conference with Tom Kawasaki
9/26/2021	Larry Organ	Meet	4.9	Meet with Owen Diaz for trial prep
9/26/2021	Larry Organ	Plan/ Prepare	3	Review and finalize Kawasaki examination
9/26/2021	Larry Organ	Plan/ Prepare	3.9	Plan and prepare for trial - finalize and review Ed Romero examination
9/27/2021	Larry Organ	Plan/ Prepare	0.9	Prepare for Romero prior to leaving for court
9/27/2021	Larry Organ	Appearance/ Attend	7.6	Attend Day 2 of Court - Opening statements, Tom Kawasaki Direct and Cross, Ed Romero Direct - and travel to and from Court
9/27/2021	Larry Organ	Communication	0.6	Phone conf. with Sabrina, Nav, Cimone and Bernard re strategy and tasks
9/27/2021	Larry Organ	Communication	0.6	Meet with Bernard, Owen, Cimone, Sabrina and Susan with debrief and additional tasks
9/27/2021	Larry Organ	Plan/ Prepare	6.3	Prepare for next Day Witnesses, review trial transcript from 9/27/21
9/28/2021	Larry Organ	Plan/ Prepare	0.7	Prepare for Day 3 of trial prior to trial
9/28/2021	Larry Organ	Appearance/ Attend	7.6	Appear for Day 3 of trial -- Ed Romero Cross, Redirect -- Wayne Jackson, Jackelin Delgado, Victor Quintero -- court received 106 with limiting instruction refused Ex. 109 -- and travel to and from court
9/28/2021	Larry Organ	Plan/ Prepare	7.4	Prepare for examination of Owen Diaz
9/29/2021	Larry Organ	Plan/ Prepare	0.5	Prepare for court today
9/29/2021	Larry Organ	Appearance/ Attend	7.5	Appear for Day 4 of Trial -- Video of Kevin McGinn, Video of Demetric Diaz, Owen Diaz Testimony (LO) - interrupt with Michael Wheeler (Bernard), finish Owen Direct (LO), Owen cross begins -- travel to and from court
9/29/2021	Larry Organ	Review/ Analyze	0.2	Review verdict form
9/29/2021	Larry Organ	Meet	0.8	Meet with team and strategize about witnesses during lunch
9/29/2021	Larry Organ	Communication	0.2	communication with Charles Mahla
9/29/2021	Larry Organ	Communication	0.1	Email OC re Mahla demonstratives and basis
9/29/2021	Larry Organ	Review/ Analyze	0.6	review jury instructions and meet with Cimone re same for preparation of objections

Date	User	Activity	Time	Description
9/29/2021	Larry Organ	Plan/ Prepare	0.6	Plan and Prepare for trial - review designations of Marconi and highlight areas Judge might have a concern about
9/29/2021	Larry Organ	Plan/ Prepare	1.3	Review Jury Instructions, meet with Cimone, review objections
9/29/2021	Larry Organ	Plan/ Prepare	2.5	Review and analyze testimony from Day 4 of trial and plan redirect of Owen Diaz
9/29/2021	Larry Organ	Communication	0.1	Email to OC re expert demonstratives
9/29/2021	Larry Organ	Communication	0.1	Email from Amy Oppenheimer re exhibits
9/30/2021	Larry Organ	Plan/ Prepare	0.8	Prepare for examination of Charles Mahla
9/30/2021	Larry Organ	Plan/ Prepare	0.7	Prepare for examination of Amy Oppenheimer
9/30/2021	Larry Organ	Plan/ Prepare	0.4	Review and prepare for Lamar Patterson examination which we may or may not use
9/30/2021	Larry Organ	Plan/ Prepare	0.6	Prepare for Owens cross and redirect - review transcript prior to trial
9/30/2021	Larry Organ	Appearance/ Attend	7.2	appear for Day 5 of Trial -- Owen Diaz cross and redirect(me), Anthony Reading (Bernard), LaDrea Jones (Cimone), Play Marconi, Amy Oppenheimer (me), Dr. Charles Mahla (LO) - read discovery, admit exhibits 3, 6, 389, Adjourn -- travel to and from court (Note protest on Golden Gate Bridge)
9/30/2021	Larry Organ	Meet	2.2	Meet with Trial Team to discuss strategy and remaining tasks and evidence from today and closing argument
9/30/2021	Larry Organ	Communication	0.1	Email from Tracey Kennedy objecting to expert reports
9/30/2021	Larry Organ	Communication	0.2	Phone call with Amy Oppenheimer prior to court re testimony
9/30/2021	Larry Organ	Plan/ Prepare	3.3	Prepare for examination of Joyce Delagrande
9/30/2021	Larry Organ	Review/ Analyze	0.9	Review and edit Heisen testimony
9/30/2021	Larry Organ	Draft/ Revise	0.1	Edit Jury Instruction brief
10/1/2021	Larry Organ	Plan/ Prepare	0.4	Prepare prior to court
10/1/2021	Larry Organ	Appearance/ Attend	6.8	Appear for Day 6 of trial - Examination of witnesses -- Joyce Delagrande (LO), video of Annalisa Heisen (16/9 min), Ramon Martinez (Bernard), -- following witnesses, discussion of jury instructions with the Court
10/1/2021	Larry Organ	Meet	3	Meet with Bernard, Cimone, Nav and Susan to discuss closing powerpoint presentation
10/1/2021	Larry Organ	Communication	0.1	Phone call with Sabrina re exhibits
10/1/2021	Larry Organ	Plan/ Prepare	4.8	Review transcripts for closing argument

Date	User	Activity	Time	Description
10/1/2021	Larry Organ	Communication	0.1	email to team regarding Motions filed by Defendant
10/1/2021	Larry Organ	Review/ Analyze	0.1	Receive and review docket entries for two motions filed by Tesla after 10:00 pm
10/2/2021	Larry Organ	Review/ Analyze	0.2	Review and analyze defendant's Motion to Strike Mahla testimony
10/2/2021	Larry Organ	Communication	0.1	Phone conf. with Charles Mahla re motion to strike
10/2/2021	Larry Organ	Meet	0.2	Meet with Nav re strategy for Opposition to motion to strike Mahla testimony
10/2/2021	Larry Organ	Communication	0.1	Phone conf. with Bernard re closing
10/2/2021	Larry Organ	Meet	0.4	Review objection by Defendant to Verdict form and meet with team to analyze and discuss
10/2/2021	Larry Organ	Draft/ Revise	0.3	Revise Opposition to Motion to Strike Mahla
10/2/2021	Larry Organ	Draft/ Revise	0.3	Revise Opposition to Defendant's Motion for Judgment as a Matter of Law
10/2/2021	Larry Organ	Meet	0.3	Meet with Cimone re Motion for Judgment as a Matter of Law
10/2/2021	Larry Organ	Plan/ Prepare	11.7	Prepare for closing argument -- assist Bernard pulling quotes and reviewing transcripts and creating information for closing PPT slides
10/2/2021	Larry Organ	Communication	0.1	Phone conf. with Sabrina re trial testimony
10/3/2021	Larry Organ	Plan/ Prepare	10.2	Plan and prepare for closing argument by working with CCRLG team and Bernard Alexander to create PPT slides and to prepare for rebuttal
10/3/2021	Larry Organ	Communication	0.1	Email exchange with Tracey Kennedy regarding two exhibits
10/3/2021	Larry Organ	Meet	2	Meet with Navruz Avloni, Cimone Nunley, Sabrina Grislis, and Susan Organ to brainstorm ideas for rebuttal arguments
10/3/2021	Larry Organ	Communication	0.1	Discussion with Navruz Avloni regarding Jackelin Delgado Smith's trial testimony for use in closing statement power point
10/3/2021	Larry Organ	Meet	0.4	Meet with Bernard Alexander, Navruz Avloni, and Susan Organ to discuss rebuttal ideas and exhibit 106
10/4/2021	Larry Organ	Appearance/ Attend	10.7	Attend Day 7 of trial - Closing arguments and Jury Deliberation - 3.5 hours of deliberations - Verdict of \$6.9 million in compensatory damages and \$130 million in punis. Travel to and from courthouse
10/6/2021	Larry Organ	Communication	0.3	Phone call with Bernard Alexander re post-trial briefing
10/6/2021	Larry Organ	Communication	0.4	Phone conference with Sandy Rosen regarding post-trial matters - his team is very busy with other matters
10/6/2021	Larry Organ	Communication	0.1	Phone conference with Owen Diaz regarding verdict



Date	User	Activity	Time	Description
10/6/2021	Larry Organ	Communication	0.1	Call with Navruz Avloni regarding motion fee research
10/7/2021	Larry Organ	Meet	0.9	Meeting with Michael Rubin (Altschuler Berzon) and Cimone Nunley regarding post-trial and appellate issues
10/7/2021	Larry Organ	Communication	0.1	Phone conference with Cimone Nunley regarding post-trial issues
10/7/2021	Larry Organ	Communication	0.1	Phone conference with Sabrina Grislis regarding exhibit issue
10/7/2021	Larry Organ	Communication	0.1	Phone conference with Owen Diaz regarding appellate counsel
10/7/2021	Larry Organ	Communication	0.3	Phone conference with Owen Diaz regarding discussion of recovery issues
10/7/2021	Larry Organ	Communication	0.2	Phone conf. with Bernard Alexander re appellate issues
10/7/2021	Larry Organ	Meet	0.5	Meet with Bernard Alexander, Cimone Nunley, and Sabrina Grislis to discuss post-trial work
10/7/2021	Larry Organ	Communication	0.2	Discussion with Navruz Avloni regarding appeal and other issues
10/8/2021	Larry Organ	Communication	0.2	Phone call with Owen Diaz regarding appeal
10/8/2021	Larry Organ	Communication	0.1	Phone conference with Bernard Alexander regarding appellate issues
10/8/2021	Larry Organ	Communication	0.1	Call with Cimone Nunley regarding judgment form
10/9/2021	Larry Organ	Communication	0.3	Email exchanges with Michael Rubin re retention of services
10/9/2021	Larry Organ	Communication	0.1	Phone conference with Bernard Alexander regarding appeal
10/10/2021	Larry Organ	Communication	0.2	Email exchanges with Michael Rubin re retention
10/10/2021	Larry Organ	Communication	0.1	Phone conference with Owen Diaz regarding appeal and related issues
10/10/2021	Larry Organ	Communication	0.2	Phone conference with Cimone Nunley regarding appeal issues
10/11/2021	Larry Organ	Communication	2.7	Meet with Owen regarding case matters
10/11/2021	Larry Organ	Communication	0.2	Telephone conference with Cimone Nunley regarding fee motion and juror outreach attempts
10/12/2021	Larry Organ	Meet	1.5	Meet with Michael Rubin, Jonathan Rosenthal, Cimone Nunley, Navruz Avloni, and Sabrina Grislis regarding next steps of Diaz case in preparation for appeal
10/17/2021	Larry Organ	Review/ Analyze	3.7	Review transcripts for issues re post trial motions
10/22/2021	Larry Organ	Plan/ Prepare	0.6	Review initial draft of Motion for Attorney's Fees
10/25/2021	Larry Organ	Plan/ Prepare	1.4	Prepare for post-trial motions - review and annotate part of 9/28/21 transcript

Date	User	Activity	Time	Description
10/25/2021	Larry Organ	Communication	0.2	phone conf. with Cimone Nunley re attorney's fees motion
10/28/2021	Larry Organ	Communication	0.1	Phone call with Dan Posner re stipulation re briefing and attorney's fees
10/28/2021	Larry Organ	Communication	0.1	Email to Posner re terms and sample stipulation
10/29/2021	Larry Organ	Review/ Analyze	0.1	Review draft stipulation
10/29/2021	Larry Organ	Communication	0.1	Communication to team re draft stipulation
11/12/2021	Larry Organ	Communication	0.6	Phone call with Cimone re new trial and juror issues relating to potential post-trial motions
11/16/2021	Larry Organ	Review/ Analyze	0.7	Review and analyze Rule 50 & 59 Motion by Defendant
11/17/2021	Larry Organ	Research	1.5	Legal research re Defendant's Rule 50/59 Motion
11/17/2021	Larry Organ	Review/ Analyze	3	Review record for emotional distress testimony to respond to Defendant's Rule 50/59 Motion
11/18/2021	Larry Organ	Meet	1.3	Meet with Post Trial team to discuss opposition papers and make assignments
11/18/2021	Larry Organ	Communication	0.3	Phone call with Cimone re post trial briefing
11/18/2021	Larry Organ	Research	3.5	Legal research re post trial motions
11/20/2021	Larry Organ	Plan/ Prepare	11.4	Review and analyze defendant's Motion for JMOL and review record regarding emotional distress issues
11/21/2021	Larry Organ	Draft/ Revise	8.7	Review record and draft section on emotional distress damages suffered by Owen Diaz
11/23/2021	Larry Organ	Communication	0.2	Phone conf. with Cimone re opposition papers
11/24/2021	Larry Organ	Communication	0.1	Communication with Cimone re opposition papers
11/24/2021	Larry Organ	Review/ Analyze	0.8	Review initial partial draft of opposition papers
11/24/2021	Larry Organ	Meet	0.8	Meet with CCRLG team, Michael Rubin, Jono Rosenthal, and Bernard Alexander
11/24/2021	Larry Organ	Communication	0.1	Phone conf. with Bernard after meeting
11/24/2021	Larry Organ	Communication	0.1	Phone conf. with Sabrina re zoom meeting
11/28/2021	Larry Organ	Draft/ Revise	2.1	Revise second draft and review transcripts for opposition papers
11/28/2021	Larry Organ	Communication	0.2	Communication with co-counsel re terminology in brief
11/28/2021	Larry Organ	Draft/ Revise	7.2	Revisions to draft opposition

Date	User	Activity	Time	Description
11/29/2021	Larry Organ	Draft/ Revise	8.9	Revise opposition papers
11/29/2021	Larry Organ	Review/ Analyze	1	Additional analysis of Tesla's arguments in opening brief
11/30/2021	Larry Organ	Communication	0.1	communication with Cimone re additional facts to add to opposition papers
11/30/2021	Larry Organ	Communication	0.2	Additional communication with Cimone regarding different and additional facts to add to brief
11/30/2021	Larry Organ	Communication	0.1	Phone call with Cimone re factual issues and opposing brief
12/4/2021	Larry Organ	Draft/ Revise	5.5	Revise opposition and fact research relating to same
12/5/2021	Larry Organ	Draft/ Revise	9.9	continued revisions of brief
12/5/2021	Larry Organ	Communication	0.2	communications with Bernard re edits
12/5/2021	Larry Organ	Communication	0.1	communication with Cimone re research
12/5/2021	Larry Organ	Communication	0.1	Emails to team on updates of progress on editing process
12/6/2021	Larry Organ	Meet	1.5	Meet with client to discuss motion and appeal issues
12/6/2021	Larry Organ	Communication	0.2	Phone conf. with Michael Rubin re brief
12/6/2021	Larry Organ	Review/ Analyze	2.5	Review revised brief to make changes for filing
12/7/2021	Larry Organ	Draft/ Revise	7.6	Review and revise latest version of brief and get ready for filing
12/7/2021	Larry Organ	Communication	0.2	Phone call with Michael Rubin re opposition brief
12/7/2021	Larry Organ	Communication	0.1	Phone conf. with Jono Rosenthal re brief
12/7/2021	Larry Organ	Communication	0.2	follow up conversation with Michael Rubin re opposition brief
12/7/2021	Larry Organ	Communication	0.1	follow up conversation with Michael Rubin re edits to brief
12/7/2021	Larry Organ	Communication	0.1	Phone conf. with Cimone Nunley re legal research
1/13/2022	Larry Organ	Plan/ Prepare	2.7	Review briefs and cases and trial transcripts to prepare for oral argument practice
1/14/2022	Larry Organ	Plan/ Prepare	1	prepare for oral argument on motion for Judgment as a matter of law
1/14/2022	Larry Organ	Meet	1.5	meet with Michael Rubin and Bernard and rest of team to go over oral argument for Defendant's motion for judgment as a matter of law
1/14/2022	Larry Organ	Communication	0.1	discussion with Nav re motion for judgment as a matter of law

Date	User	Activity	Time	Description
1/19/2022	Larry Organ	Plan/ Prepare	4	prepare for oral argument
1/19/2022	Larry Organ	Appearance/ Attend	2	Appear for hearing on Defense Motion
1/19/2022	Larry Organ	Communication	0.4	Phone conf. after argument with Bernard and Cimone to discuss next steps and attorneys fees motion
1/19/2022	Larry Organ	Communication	0.2	Phone conf. with client Owen Diaz after oral argument
2/9/2022	Larry Organ	Research	2.2	Research re attorney's fees lodestar and rates in Bay Area
3/14/2022	Larry Organ	Communication	0.3	Communication with Cimone Nunley re attorney's fees motion
4/4/2022	Larry Organ	Research	0.5	Legal research re attorney's fees motion
4/12/2022	Larry Organ	Meet	1.2	Meet with client
4/13/2022	Larry Organ	Review/ Analyze	0.9	Review and analyze post trial order
4/13/2022	Larry Organ	Communication	0.5	Phone call with Bernard and Michael Rubin re post trial order and strategy
4/13/2022	Larry Organ	Communication	0.2	communication with client re post trial order
4/13/2022	Larry Organ	Communication	0.2	Phone call with Nav and Cimone re post trial order
4/19/2022	Larry Organ	Meet	0.8	Meet with Michael, Jono, Cimone and Bernard to discuss post-remittitur options
4/19/2022	Larry Organ	Communication	0.3	Phone conf. with Bernard re remittitur options
4/19/2022	Larry Organ	Communication	0.1	Phone conf. with Dan Posner re stipulation re attorney's fees
4/19/2022	Larry Organ	Communication	0.2	Phone conf. with Owen Diaz re remittitur issues
4/19/2022	Larry Organ	Research	1.9	Legal research re remittitur issues
4/20/2022	Larry Organ	Communication	0.3	Phone conf. with Owen and Bernard to discuss options
4/20/2022	Larry Organ	Communication	0.1	Follow up conversation with Bernard re options
4/20/2022	Larry Organ	Communication	0.1	additional follow up call with Bernard
4/21/2022	Larry Organ	Communication	0.1	Email exchange with Dan re stipulation
4/30/2022	Larry Organ	Review/ Analyze	1.2	Review briefs for certifying question
5/2/2022	Larry Organ	Communication	0.1	email to Michael re certifying question to 9th circuit

Date	User	Activity	Time	Description
5/2/2022	Larry Organ	Review/ Analyze	0.8	Further review of brief
5/2/2022	Larry Organ	Communication	0.2	Email exchange with Michael re certifying question
5/10/2022	Larry Organ	Communication	0.3	Communication with Judge Illman re settlement
6/8/2022	Larry Organ	Review/ Analyze	0.3	Review and analyze Judge's Order denying request to certify question to 9th Circuit
6/13/2022	Larry Organ	Communication	0.8	Meet with Jono, Michael, Bernard and Cimone re strategy re new trial
6/17/2022	Larry Organ	Meet	0.8	Meeting with Owen, Bernard, Michael, Cimone, Sabrina to discuss remittitur and new trial options.
6/20/2022	Larry Organ	Communication	0.1	Text exchange with client confirming his decision
6/20/2022	Larry Organ	Draft/ Revise	0.1	revise rejection of remittitur
6/21/2022	Larry Organ	Communication	0.1	Phone call with Cimone re filing of rejection
6/22/2022	Larry Organ	Communication	0.3	Phone call with McCann re Owen Diaz's case posture
7/8/2022	Larry Organ	Meet	0.6	Meet with Dan Posner re trial - Posner and his Tesla Team of Kathleen Sullivan, Alex Spiro and Asher Griffin trying case in Northern District in Mid January - Dan Posner cell number is (310)991-3320 but text or email best -- Agreed on March 20, 2023 or later trial date but if pushed, 1st two weeks of December -- discussion of scope of evidence and Bernard made point that you can't just change up liability evidence
7/8/2022	Larry Organ	Communication	0.3	Phone conf. with Bernard on meeting with Dan Posner and strategy
7/12/2022	Larry Organ	Communication	0.1	Email from Jonothan Rosenthal re authority re Gasoline products case
7/12/2022	Larry Organ	Communication	0.2	additional emails from Jono re scope of retrial
7/12/2022	Larry Organ	Research	2.4	Legal research re retrial of damages
7/12/2022	Larry Organ	Appearance/ Attend	0.4	Appear for Trial Setting Conference - trial reset to March 27, 2023 - Cathleen Sullivan argued Gasoline Products case to Judge Orrick and he indicated his high reluctance to agree
7/12/2022	Larry Organ	Communication	0.3	Phone call with Michael Rubin and Bernard Alexander re strategy
9/9/2022	Larry Organ	Plan/ Prepare	0.8	Review materials to prepare for meeting with OC re retrial
9/9/2022	Larry Organ	Meet	0.9	Meet with Dan Posner, Asher Griffin, and Dallas Bullard and Michael Rubin re retrial evidence and 7th Amendment - we agreed to reconvene the week of Sept. 19
9/9/2022	Larry Organ	Communication	0.2	phone conf. with Michael Rubin re retrial issues

Date	User	Activity	Time	Description
9/19/2022	Larry Organ	Communication	0.7	Meeting with Michael and Jono re meeting with Tesla tomorrow
9/19/2022	Larry Organ	Research	3.4	Legal research on Gasoline Products
9/20/2022	Larry Organ	Meet	1	Meet with Dan Posner, Asher Griffin, Dallas Bullard and Michael Rubin and Jono Rosenthal re CMC statement and Gasoline Products issues
9/20/2022	Larry Organ	Communication	0.1	Follow up discussion with Michael re strategy
9/23/2022	Larry Organ	Review/ Analyze	0.2	Review case management document prepared by defendant
10/3/2022	Larry Organ	Plan/ Prepare	1.1	Review materials for CMC tomorrow
10/3/2022	Larry Organ	Meet	0.7	Meet with Michael, Jono and Bernard re strategy for tomorrow
10/4/2022	Larry Organ	Plan/ Prepare	0.9	Review exhibits and Trial Testimony to prepare for CMC in case Judge Orrick wants to discuss that
10/4/2022	Larry Organ	Appearance/ Attend	0.4	Appear for CMC
12/7/2022	Larry Organ	Appearance/ Attend	0.4	Appear for Hearing on Motion for New Trial by Tesla - Court denied motion - set case for CMC on 1-17 - trial is going forward on 3-27
12/7/2022	Larry Organ	Communication	0.4	Phone conf. with Michael and Bernard re retrial issues
12/7/2022	Larry Organ	Communication	0.3	Phone conf. with Bernard on scope of trial
12/7/2022	Larry Organ	Communication	0.2	Phone conf. with Dustin Collier re working on Trial
12/9/2022	Larry Organ	Communication	0.4	Phone conf. with Bernard Alexander re meeting Monday
12/11/2022	Larry Organ	Plan/ Prepare	1.8	Review case materials and Prepare agenda for meeting with trial and appellate team set for tomorrow
12/12/2022	Larry Organ	Meet	2.7	Meet with trial and appellate team re case strategy
12/12/2022	Larry Organ	Communication	0.1	Email to defense counsel requesting meeting to discuss matters in advance of Jan. 17 hearing
12/13/2022	Larry Organ	Communication	0.3	Phone conf. with Dustin Collier re strategy
12/13/2022	Larry Organ	Plan/ Prepare	5.9	prepare for focus group - draft questions to use
12/16/2022	Larry Organ	Communication	0.3	Phone conf. with Judge Illman re settlement issues and current attorney's fees numbers
12/16/2022	Larry Organ	Communication	0.1	Email to co-counsel re lodestar figures
12/19/2022	Larry Organ	Communication	0.9	Phone conf. with Dustin Collier re strategy

Date	User	Activity	Time	Description
12/19/2022	Larry Organ	Communication	0.1	email exchange with Dustin Collier re meeting to discuss strategy
12/19/2022	Larry Organ	Review/ Analyze	1.5	Review and analyze and edit draft jury instructions
12/19/2022	Larry Organ	Plan/ Prepare	2.9	Prepare for focus group
12/20/2022	Larry Organ	Communication	0.1	Phone conf. with Dustin Collier re fact analysis
12/20/2022	Larry Organ	Communication	0.2	Phone conf. with Michael Rubin and Dustin Collier re meeting with Tesla Lawyers tomorrow and approach regarding jury instructions
12/20/2022	Larry Organ	Draft/ Revise	0.3	Draft agenda for meeting with Tesla Lawyers
12/20/2022	Larry Organ	Communication	0.1	Email draft agenda to Michael Rubin
12/20/2022	Larry Organ	Communication	0.5	Call with Dustin Collier re strategy and fact issues
12/21/2022	Larry Organ	Meet	1.5	Meeting with Dan Posner, Asher Griffin, Mari Henderson, and Michael Rubin
12/21/2022	Larry Organ	Communication	0.1	Phone call with Michael after Meeting with OC
12/21/2022	Larry Organ	Communication	0.1	Additional call with Michael re scope of evidence
12/21/2022	Larry Organ	Communication	0.1	Phone call with Dustin re strategy
12/21/2022	Larry Organ	Plan/ Prepare	6.3	prepare for focus group - draft script and review materials
12/21/2022	Larry Organ	Appearance/ Attend	2.1	Attend - Moderate Focus Group
12/21/2022	Larry Organ	Communication	0.6	Meet with Dustin, Susan, Sabrina, Teo and Kira re focus group
12/27/2022	Larry Organ	Review/ Analyze	4.5	Review and annotate Trial Transcript Day 1 for Retrial
12/28/2022	Larry Organ	Review/ Analyze	3.9	Review Day 1 Transcript and annotate for retrial
12/29/2022	Larry Organ	Meet	0.4	Meet with Cimone re MILs and briefing for trial
12/29/2022	Larry Organ	Review/ Analyze	5	Review and annotate Days 1 & 2 of Trial Transcripts
12/30/2022	Larry Organ	Review/ Analyze	6.1	Review and annotate Day 2 of Trial transcript
12/31/2022	Larry Organ	Review/ Analyze	6.5	Review and analyze and annotate trial transcript Day 2 and review exhibits from Trial for use in re-trial
1/1/2023	Larry Organ	Review/ Analyze	6.2	Review Day 3 trial transcripts and exhibits and annotate for retrial
1/2/2023	Larry Organ	Review/ Analyze	2.3	Review and Analyze Day 3 transcripts and exhibits for use at retrial

Date	User	Activity	Time	Description
1/3/2023	Larry Organ	Review/ Analyze	5.1	Review and analyze Day 3 transcripts and exhibits for retrial
1/4/2023	Larry Organ	Meet	1.3	Meet with Diaz strategy team to discuss retrial strategy, Bernard, Michael, Jono, Marqui, Cimone and Susan
1/4/2023	Larry Organ	Plan/ Prepare	2.8	Review materials to get ready for strategy meeting
1/4/2023	Larry Organ	Communication	0.1	Phone call with Tom Kawasaki re testimony on March 27 - he said he would and we will send subpoena and standby agreement
1/5/2023	Larry Organ	Plan/ Prepare	2.2	Prepare for meet and confer with defense counsel - review transcript from 12/7/22 and other relevant materials for meeting
1/5/2023	Larry Organ	Communication	1	Meet with Diaz Team re strategy
1/5/2023	Larry Organ	Meet	0.5	Follow up meeting with Team re strategy
1/5/2023	Larry Organ	Draft/ Revise	2.5	draft proposed joint statement
1/5/2023	Larry Organ	Communication	0.1	Email to team re proposed joint statement
1/5/2023	Larry Organ	Draft/ Revise	1.9	Revise Proposed Initial Jury Instructions
1/5/2023	Larry Organ	Communication	0.1	Phone conf. with Michael re jury instructions
1/6/2023	Larry Organ	Review/ Analyze	2.5	Review and revise edits to documents for review and possible use with other side
1/6/2023	Larry Organ	Meet	0.3	Meet with Team prior to meeting with Tesla
1/6/2023	Larry Organ	Communication	0.9	meet with OC and Plaintiff's Team to discuss retrial
1/6/2023	Larry Organ	Meet	1.2	Meet with Team after meeting with OC to discuss strategy
1/6/2023	Larry Organ	Draft/ Revise	2.4	start draft summary of scope of witness testimony
1/6/2023	Larry Organ	Communication	0.2	Phone conf. With Marqui re strategy issues
1/7/2023	Larry Organ	Review/ Analyze	2	Review and analyze testimony of Annalisa Heisen and annotate for use at trial
1/7/2023	Larry Organ	Draft/ Revise	1.8	revise witness descriptions
1/7/2023	Larry Organ	Research	0.7	research re witnesses identified by Tesla
1/8/2023	Larry Organ	Communication	0.1	Email to Michael Rubin re witness information for joint statement
1/8/2023	Larry Organ	Draft/ Revise	4.3	draft and revise witness summary for joint statement after review of witness testimony



Date	User	Activity	Time	Description
1/8/2023	Larry Organ	Communication	0.2	Email and text exchange with Michael Rubin re responding to Tesla proposed statement
1/8/2023	Larry Organ	Communication	0.1	Communication with Cimone Nunley re preparing draft of statement for judge
1/9/2023	Larry Organ	Draft/ Revise	0.3	Review and revise latest version of jt statement
1/9/2023	Larry Organ	Communication	0.1	Email exchange with Michael Rubin re jt statement
1/9/2023	Larry Organ	Communication	0.1	Email to Cimone re jt statement
1/9/2023	Larry Organ	Communication	0.1	Email to Dan Posner re need for another meet and confer
1/9/2023	Larry Organ	Communication	0.1	Response from Dan Posner re meeting at 5:30
1/9/2023	Larry Organ	Communication	0.6	Meet and confer with OC re joint statement on scope of evidence
1/9/2023	Larry Organ	Communication	0.4	Meet with Bernard, Michael, Cimone and Jono re strategy
1/9/2023	Larry Organ	Review/ Analyze	1.9	Review and analyze and annotate Trial transcripts Day 4 in preparation for retrial
1/10/2023	Larry Organ	Review/ Analyze	1.7	Review statement by defense and factual and legal research re same
1/10/2023	Larry Organ	Draft/ Revise	0.7	make additional edits to the Jt. Status report regarding the scope of evidence
1/10/2023	Larry Organ	Communication	0.2	Phone conf. with Michael Rubin re edits to Jt. Status Report
1/10/2023	Larry Organ	Communication	0.3	Email to team re changes to Joint Status Report
1/10/2023	Larry Organ	Review/ Analyze	0.3	Review and analyze additional changes from defendant on issues like Hurtado and reprehensibility
1/10/2023	Larry Organ	Communication	0.2	Communication with team re additional edits to Jt. Status Report
1/10/2023	Larry Organ	Communication	0.2	Email and text exchange with Cimone re changes and edits and exchange with other side
1/11/2023	Larry Organ	Review/ Analyze	4.6	Review Diaz trial transcripts in conjunction with deposition transcripts for use at retrial
1/12/2023	Larry Organ	Appearance/ Attend	4.9	Attend MSC with Judge Illman and Owen Diaz - Dan Posner was there -- they indicated their goal was \$0 recovery-- and travel time to and from San Francisco
1/12/2023	Larry Organ	Communication	0.1	communication with Sabrina re total costs
1/12/2023	Larry Organ	Communication	0.1	phone conf. with Bernard re total costs to date
1/12/2023	Larry Organ	Communication	0.1	communication with Michael Rubin re total attorneys fees
1/12/2023	Larry Organ	Review/ Analyze	1.4	Review and analyze Diaz trial transcripts for use at retrial

Date	User	Activity	Time	Description
1/13/2023	Larry Organ	Communication	0.4	Phone call with Harry Plotkin re jury selection
1/13/2023	Larry Organ	Communication	0.1	Phone call with Bernard Alexander re jury selection
1/13/2023	Larry Organ	Communication	0.4	Speak with Jennifer Reisch re witnesses in Diaz
1/13/2023	Larry Organ	Review/ Analyze	2.6	Review and Analyze and annotate trial transcripts and exhibits
1/14/2023	Larry Organ	Review/ Analyze	3.9	Review and analyze Diaz Trial Transcripts and Exhibits from Day 4 and compare with Days 1-3 and review exhibits for retrial
1/15/2023	Larry Organ	Review/ Analyze	2.5	Review and analyze Diaz Trial Transcripts and Exhibits from Day 5 and compare with Days 1-4 and review exhibits for retrial
1/15/2023	Larry Organ	Review/ Analyze	1.4	Review and analyze exhibits re admission in first trial and admissibility in second trial
1/17/2023	Larry Organ	Appearance/ Attend	6.7	Attend Littleton v. Musk trial Day 1 (voir dire) to get an understanding of how Alex Spiro tries cases and travel to and from San Francisco
1/17/2023	Larry Organ	Review/ Analyze	1.5	Review exhibits to determine relevance to retrial
1/17/2023	Larry Organ	Communication	0.1	communication with Sabrina to send list of admitted exhibits to Tesla counsel with Plaintiff's position on relevance
1/17/2023	Larry Organ	Review/ Analyze	0.3	Review document created by Sabrina re relevance determinations
1/17/2023	Larry Organ	Plan/ Prepare	0.5	Review judge's prior statements from Dec. 7 and statements from parties as well as draft instructions and statement of the case
1/17/2023	Larry Organ	Communication	0.1	communication to Cimone re MILs
1/17/2023	Larry Organ	Appearance/ Attend	0.4	Appear for hearing with Judge Orrick re scope of evidence - essentially the trial will be limited to evidence previously presented - they might be able to bring in a PMK live but that person would be limited to the scope of evidence from first trial - witnesses not called in first trial will not be admitted unless a showing of fundamental reason for admitting them - exhibits not used in prior trial will not be coming in
1/17/2023	Larry Organ	Meet	0.6	Meet with Michael, Cimone and Bernard re Judge's statements and MILs and strategy
1/17/2023	Larry Organ	Communication	0.1	Text exchange with Owen Diaz re hearing today
1/17/2023	Larry Organ	Communication	0.1	Phone message for Owen Diaz informing him of general outcome of meeting with the Judge
1/17/2023	Larry Organ	Communication	0.2	Phone conf. with Owen re scope of retrial and things he needs to do to prepare
1/18/2023	Larry Organ	Appearance/ Attend	4.8	Attend Littleton Trial for opening statements by Alex Spiro and travel to and from SF
1/18/2023	Larry Organ	Communication	0.2	Phone conf. with Marqui re trial team

Date	User	Activity	Time	Description
1/18/2023	Larry Organ	Communication	0.3	Phone conf. Michael Rubin re trial matters and strategy
1/18/2023	Larry Organ	Communication	0.3	Phone conf. with Bernard Alexander to discuss opening and strategy and Alex Spiro's opening in the Littleton v. Tesla case
1/19/2023	Larry Organ	Meet	1.2	Meet and Confer with OC re in limine motions and experts and witnesses
1/19/2023	Larry Organ	Communication	0.2	Phone conf. with Bernard and Cimone re in limine motions
1/19/2023	Larry Organ	Communication	0.3	Phone conf. with Dustin Collier re focus groups and strategy
1/19/2023	Larry Organ	Plan/ Prepare	2.6	Prepare for trial - review testimony and exhibits
1/20/2023	Larry Organ	Research	2.5	Legal Research re reprehensibility and Philip Morris v Williams and White v Ford Motor Co.
1/20/2023	Larry Organ	Review/ Analyze	1.5	Review evidence for scope of in limine motions
1/21/2023	Larry Organ	Review/ Analyze	0.9	Review draft of MILs
1/21/2023	Larry Organ	Draft/ Revise	1.3	Review Cimone draft MILs and make handwritten edits while Bernard does editing
1/21/2023	Larry Organ	Draft/ Revise	1.5	Additional research and edits to Plaintiff's MILs after Bernard edited document
1/21/2023	Larry Organ	Communication	0.1	email to Jono and Michael re edits to MILs
1/23/2023	Larry Organ	Appearance/ Attend	7.8	Attend in Littleton case researching Alex Spiro and travel to and from San Francisco
1/24/2023	Larry Organ	Communication	0.1	Communication with Owen Diaz re trial transcripts
1/24/2023	Larry Organ	Communication	0.1	Communication with Sabrina re trial transcripts for Owen Diaz
1/24/2023	Larry Organ	Communication	0.8	Phone conf. with Michael and Jono re MILs
1/24/2023	Larry Organ	Communication	0.3	Continued Communication with Jono Rosenthal re MILs
1/24/2023	Larry Organ	Communication	0.2	Phone conf. Marqui Hood re PMK
1/24/2023	Larry Organ	Review/ Analyze	0.8	Review and Analyze MIL arguments and research re same
1/25/2023	Larry Organ	Meet	1.4	Meet with OC re MILs etc
1/25/2023	Larry Organ	Plan/ Prepare	1.9	Receive defendant's exhibit designations and review their exhibits and their positions on the evidence
1/25/2023	Larry Organ	Communication	0.1	Phone call with Cimone re MILs
1/25/2023	Larry Organ	Communication	0.1	Follow up phone call with Cimone re MILs

Date	User	Activity	Time	Description
1/25/2023	Larry Organ	Meet	0.5	Meet with Michael, Jono, and Cimone after meeting with Tesla
1/25/2023	Larry Organ	Communication	0.3	Phone conf. with Jono and Cimone re MIL issues
1/26/2023	Larry Organ	Communication	0.1	communication with Sabrina re submissions for exchange on Monday
1/26/2023	Larry Organ	Communication	0.2	Email exchange with team re equitable relief
1/26/2023	Larry Organ	Plan/ Prepare	4	Prepare for trial - review testimony re damages issues generally for trial trial strategy
1/27/2023	Larry Organ	Appearance/ Attend	7.7	Attend Littleton trial to observe opposing counsel in trial and travel to and from San Francisco
1/27/2023	Larry Organ	Draft/ Revise	2.6	Review and revise video designations for Demetric Di-az, McGinn, Marconi and Heisen
1/27/2023	Larry Organ	Draft/ Revise	2.4	Begin reviewing and drafting revised jury instructions for retrial
1/29/2023	Larry Organ	Review/ Analyze	2.8	review and edit plaintiff's MILs for retrial
1/30/2023	Larry Organ	Meet	1.9	Meet with Michael, Jono, Cimone, and Bernard re MILs
1/30/2023	Larry Organ	Review/ Analyze	1.8	Review and edit documents for exchange with OC
1/31/2023	Larry Organ	Review/ Analyze	3.1	Review and edit documents for exchange
2/1/2023	Larry Organ	Meet	1.9	Meet with DiazTeam to discuss MILs and other strategy issues
2/1/2023	Larry Organ	Appearance/ Attend	6.7	Attend In Re Tesla Trial to observe Opposing Counsel strategy and travel to and from San Francisco
2/1/2023	Larry Organ	Review/ Analyze	3.7	Review and analyze and do related factual research relating to their exchange documents
2/2/2023	Larry Organ	Communication	0.1	Phone call with client re retrial
2/2/2023	Larry Organ	Meet	1.6	Meet and confer with Dan Posner, Asher Griffin and Mari Henderson with Bernard Alexander, Michael Rubin, Jonothan Rosenthal, Marqui Hood and Cimone Nunley re jury instructions and scope of evidence - Dan finally admitted they intend to introduce new evidence about changes at Tesla that were not identified during the first trial
2/2/2023	Larry Organ	Plan/ Prepare	1.5	Review materials for meeting with OC
2/2/2023	Larry Organ	Communication	0.5	Meet with Michael, Jono, Bernard, Cimone and Marqui re meeting we just had with OC and need to update MIL to reflect new information they give us about the scope of evidence they intend to introduce
2/3/2023	Larry Organ	Appearance/ Attend	6.8	Observe closing arguments in Littleton case and travel to and from San Francisco

Date	User	Activity	Time	Description
2/3/2023	Larry Organ	Draft/ Revise	0.4	Review, related research and edit added footnote
2/3/2023	Larry Organ	Communication	0.1	Communication with Sabrina re filing
2/3/2023	Larry Organ	Communication	0.1	additional communication with Sabrina re filing
2/3/2023	Larry Organ	Communication	0.1	Phone conf. with Michael and Sabrina re filing
2/3/2023	Larry Organ	Communication	0.5	Phone conf. with Bernard re strategy issues and timing
2/3/2023	Larry Organ	Communication	0.1	email to OC disclosing that we have amended MIL 2 to include additional footnote
2/3/2023	Larry Organ	Communication	0.1	email from OC re additional footnote
2/3/2023	Larry Organ	Communication	0.1	response to their response re footnote
2/3/2023	Larry Organ	Review/ Analyze	0.7	review MILs filed by Defendant
2/4/2023	Larry Organ	Meet	0.9	Meet with Dustin Collier re tasks for Diaz - cross of client
2/4/2023	Larry Organ	Review/ Analyze	1.1	Review and analyze and research Lamar Patterson impeachment of Robert Hurtado
2/4/2023	Larry Organ	Review/ Analyze	3.4	Review Defense MIL 1 and gather evidence for opposition
2/4/2023	Larry Organ	Communication	0.1	Email to Mari Henderson re administrative filing
2/4/2023	Larry Organ	Communication	0.1	Email from Mari Henderson re administrative filing - copy of documents filed
2/4/2023	Larry Organ	Review/ Analyze	0.3	Review and analyze administrative filing
2/4/2023	Larry Organ	Communication	0.1	email to Mari Henderson re admin filing
2/4/2023	Larry Organ	Communication	0.1	Email to Jono re evidence for opposition to MILs re Hurtado
2/4/2023	Larry Organ	Communication	0.1	Email to Jono re additional evidence for opposition to MILs re Hurtado
2/4/2023	Larry Organ	Communication	0.1	Email to Jono re more additional evidence for opposition to MILs re Hurtado
2/4/2023	Larry Organ	Communication	0.1	Email to Jono re more additional evidence for opposition to MILs re Hurtado
2/4/2023	Larry Organ	Communication	0.1	Email to Jono re evidence for opposition to MILs re Donet
2/5/2023	Larry Organ	Review/ Analyze	4.5	Review and analyze Def. MILs and gather evidence for opposition papers
2/5/2023	Larry Organ	Communication	0.1	Communication with Jonathan Rosenthal re evidence for opposition papers

Date	User	Activity	Time	Description
2/5/2023	Larry Organ	Communication	0.1	Communication with Cimone re exhibit list
2/6/2023	Larry Organ	Communication	0.1	Email from Mari re lodging depositions
2/6/2023	Larry Organ	Communication	0.1	Response to Mari
2/6/2023	Larry Organ	Communication	0.1	Communication with Cimone re exhibit list
2/6/2023	Larry Organ	Communication	0.1	Communication with Sabrina re exhibit list
2/6/2023	Larry Organ	Communication	0.1	Communication with Dustin re cross of Owen
2/6/2023	Larry Organ	Communication	0.1	Communication with Bernard re witnesses
2/6/2023	Larry Organ	Review/ Analyze	0.7	additional review and analysis of MIL 1
2/6/2023	Larry Organ	Review/ Analyze	0.1	Review notice of withdrawal of administrative motion
2/6/2023	Larry Organ	Communication	0.2	Phone conf. with Michael re strategy re jury instructions
2/6/2023	Larry Organ	Communication	0.1	Phone conf. with Sabrina re exhibit list
2/6/2023	Larry Organ	Communication	0.1	Email to Sabrina re exhibit list
2/6/2023	Larry Organ	Communication	0.2	Email to Mari re providing defendant's proposed jury questionnaire and judge questions
2/6/2023	Larry Organ	Review/ Analyze	1.6	review voir dire transcript from Littleton case and highlight for jury consultant
2/6/2023	Larry Organ	Communication	0.3	Email to Harry re voir dire by Spiro
2/6/2023	Larry Organ	Communication	0.1	Email from Dan Posner re attached juror questionnaire and judge questions for the jury
2/6/2023	Larry Organ	Review/ Analyze	0.7	Review and analyze Tesla's proposed jury questionnaire and judge's questions for the jury
2/6/2023	Larry Organ	Communication	0.2	Email to Harry Plotkin re juror questionnaire and judge questions
2/6/2023	Larry Organ	Communication	0.1	Email to Dan re juror questionnaire
2/6/2023	Larry Organ	Communication	0.1	Communication with Cimone re status of projects
2/6/2023	Larry Organ	Communication	0.2	Phone conf. with Cimone re joint conference statement
2/6/2023	Larry Organ	Plan/ Prepare	6.5	Prepare for pretrial conference submissions by reviewing orders and submissions and related evidence and testimony in light of Defendant's changed position re punitive liability
2/6/2023	Larry Organ	Communication	0.2	Phone conf. with Marqui Hood re Defendant's changed position and need for a brief re same

Date	User	Activity	Time	Description
2/6/2023	Larry Organ	Communication	0.2	Phone conf. with Michael Rubin re changed position by defendant on punitive liability and related tasks
2/7/2023	Larry Organ	Meet	0.4	Meet with OC re exchange documents and time
2/7/2023	Larry Organ	Review/ Analyze	5.3	Review and revise jury instructions
2/7/2023	Larry Organ	Review/ Analyze	0.8	Review and edit brief put together by Marqui and Molly re liability for punitive damages
2/7/2023	Larry Organ	Plan/ Prepare	6.2	Review documents and review related materials for joint trial submissions
2/8/2023	Larry Organ	Meet	0.7	Meeting with Jono, Michael, Bernard, Marqui and Sabrina re filings to submit to court and strategy re same
2/8/2023	Larry Organ	Communication	0.2	Email to Dan Posner re scheduling
2/8/2023	Larry Organ	Communication	0.1	communication with Michael re meeting at 10:45 to discuss outstanding issues
2/8/2023	Larry Organ	Communication	0.1	Mutual exchange with Dan Posner of Statement of the Case and Proposed Verdict Form
2/8/2023	Larry Organ	Communication	0.1	Email exchange on scope of document exchange
2/8/2023	Larry Organ	Communication	0.1	Further clarification with Dan Posner re document exchange
2/8/2023	Larry Organ	Communication	0.2	Email exchange with Michael Rubin re edits to response to Statement of the Case and Verdict Form
2/8/2023	Larry Organ	Draft/ Revise	0.7	Draft responses to Defendant's Statement of the Case and Verdict Form
2/8/2023	Larry Organ	Review/ Analyze	6.5	Review, Research and revise documents to be submitted for the final status conference in order to exchange them at 7:00 pm
2/8/2023	Larry Organ	Communication	0.1	Email to OC re exchange of documents and revised time line for doing so
2/8/2023	Larry Organ	Communication	0.1	communication with Cimone re nominal damages research
2/8/2023	Larry Organ	Communication	0.1	communication with Molly and Marqui re scope of edits to objection
2/8/2023	Larry Organ	Communication	0.2	Communication with Michael re jury instructions
2/8/2023	Larry Organ	Communication	0.1	communication with Jono re jury instructions
2/8/2023	Larry Organ	Communication	0.1	additional communication with Michael re jury instructions and opposition to their statement of the case
2/8/2023	Larry Organ	Communication	0.1	Communication with OC exchanging documents at 7:00 pm
2/8/2023	Larry Organ	Communication	0.1	further clarification with OC re document exchange process
2/8/2023	Larry Organ	Communication	0.1	communication from OC re statement of the case and verdict form



Date	User	Activity	Time	Description
2/8/2023	Larry Organ	Communication	0.1	Email sent re jury instructions
2/8/2023	Larry Organ	Communication	0.1	communication to OC re exhibit and witness lists
2/8/2023	Larry Organ	Communication	0.1	communication re filing of verdict form and statement of case
2/8/2023	Larry Organ	Communication	0.1	communication with OC re filing of exhibit list and witness list
2/8/2023	Larry Organ	Communication	0.1	Email from Mari re jury instructions
2/8/2023	Larry Organ	Review/ Analyze	0.3	Review edits by OC to Jury Instructions
2/8/2023	Larry Organ	Communication	0.1	communication with Sabrina to file documents
2/8/2023	Larry Organ	Review/ Analyze	3.8	Review and check joint statements exchanged at 7:00 pm prior to filing so that they properly incorporate the parties changes and revise accordingly
2/9/2023	Larry Organ	Communication	0.1	Email to Mari Henderson re appearance by Quintero and Romero
2/9/2023	Larry Organ	Communication	0.1	Communication with Owen Diaz re Kawasaki
2/9/2023	Larry Organ	Communication	0.1	Communication from Mari Henderson re Romero and Quintero
2/9/2023	Larry Organ	Communication	0.1	Email to Sabrina re Quintero and Romero
2/9/2023	Larry Organ	Draft/ Revise	3.9	Revise initial draft of pretrial conference statement and check various references contained therein and add additional information
2/9/2023	Larry Organ	Review/ Analyze	0.6	Review and analyze issues relating to Exhibit 272
2/9/2023	Larry Organ	Plan/ Prepare	6	Review Trial Testimony for inconsistent testimony by defendants
2/9/2023	Larry Organ	Communication	0.1	Email exchange with Michael re Pretrial Conference Statement
2/9/2023	Larry Organ	Draft/ Revise	0.3	Revise edits to pretrial conference statement draft
2/9/2023	Larry Organ	Communication	0.1	Email to Mari Henderson sending pretrial conference statement draft for her review and edits
2/9/2023	Larry Organ	Communication	0.1	Communication with Sabrina re declaration for opposition to Defense MILs
2/9/2023	Larry Organ	Communication	0.1	Email Henderson re Ex 272 and 380
2/9/2023	Larry Organ	Communication	0.2	Revise Exhibit List to remove objection re 272 and add objections to 380
2/9/2023	Larry Organ	Communication	0.2	Email to Mari Henderson asking them to permit us to file deposition excerpts without the request for filing them under seal



Date	User	Activity	Time	Description
2/10/2023	Larry Organ	Communication	0.1	Communication to Jono re MIL opposition papers
2/10/2023	Larry Organ	Communication	0.1	Communication to Cimone re MIL Opposition papers
2/10/2023	Larry Organ	Communication	0.1	Email to Michael Rubin re MIL opposition
2/10/2023	Larry Organ	Communication	0.1	Follow up email to Mari Henderson requesting to not file documents under seal
2/10/2023	Larry Organ	Communication	0.1	Email exchange with Mari Henderson on Pretrial conference statement and referring to Tesla as Tesla Inc. rather than Tesla and other stipulations
2/10/2023	Larry Organ	Communication	0.2	Email exchanges related to agreement to "Mr. Diaz" and "Tesla Inc."
2/10/2023	Larry Organ	Communication	0.1	Communication to Mari re filing testimony under seal
2/10/2023	Larry Organ	Research	0.7	Research re filing documents under seal and uncovering de-designation efforts
2/10/2023	Larry Organ	Communication	0.1	Communication to Mari Henderson noting no blanket confidentiality designation for Owen and Demetric depositions
2/10/2023	Larry Organ	Communication	0.2	Phone conf. with Dustin Collier re Owen Prep and In Limine Oppo
2/10/2023	Larry Organ	Communication	0.1	Phone conf. with Sabrina re MIL filing
2/10/2023	Larry Organ	Communication	0.1	Email to Dustin re MIL oppo
2/10/2023	Larry Organ	Communication	0.1	Email exchange with Michael Rubin and Bernard Alexander re stipulations
2/10/2023	Larry Organ	Communication	0.1	Email from Mari Henderson agreeing we do not have to file admin. motion
2/10/2023	Larry Organ	Communication	0.1	Phone call with Sabrina re MIL opposition - Cimone Declaration
2/10/2023	Larry Organ	Draft/ Revise	2.1	Review and revise MIL Opposition
2/10/2023	Larry Organ	Communication	0.1	Phone conf. with Dustin re MIL oppo.
2/10/2023	Larry Organ	Communication	0.2	Phone conf. with Dustin and Michael re MIL Oppo
2/10/2023	Larry Organ	Review/ Analyze	2.6	Review testimony on reprehensibility
2/10/2023	Larry Organ	Review/ Analyze	0.1	review additional draft on deterrence by Michael
2/10/2023	Larry Organ	Communication	0.1	Phone conf. with Michael re deterrence issue in relation to punitive damages question
2/10/2023	Larry Organ	Draft/ Revise	1.4	Revise MIL Oppo Brief
2/10/2023	Larry Organ	Communication	0.1	communication with Sabrina re brief

Date	User	Activity	Time	Description
2/10/2023	Larry Organ	Appearance/ Attend	0.1	Phone conf. with Michael re revised brief
2/10/2023	Larry Organ	Communication	0.1	communication with Dustin with revisions to brief
2/10/2023	Larry Organ	Communication	0.1	email communication with Cimone re brief
2/10/2023	Larry Organ	Draft/ Revise	0.3	Further edits to MIL oppositions
2/11/2023	Larry Organ	Plan/ Prepare	8.2	Prepare for trial -- review materials for pretrial conference and prepare for trial by reviewing depositions and exhibits
2/11/2023	Larry Organ	Communication	0.1	Email with Tom Kawasaki re appearance
2/11/2023	Larry Organ	Communication	0.1	Email re meeting with Owen Diaz
2/12/2023	Larry Organ	Plan/ Prepare	4.1	Prepare for meeting with Owen Diaz
2/12/2023	Larry Organ	Meet	3.4	Meet with Dustin, Owen and Susan for trial prep
2/12/2023	Larry Organ	Meet	1	Meet with Susan to discuss strategy
2/12/2023	Larry Organ	Communication	0.1	Email to Amy Oppenheimer re testimony
2/13/2023	Larry Organ	Plan/ Prepare	1.1	Prepare for strategy meeting tomorrow
2/13/2023	Larry Organ	Review/ Analyze	3.9	Review and draft responses to counter designations by Defendant
2/13/2023	Larry Organ	Draft/ Revise	5.7	Review and revise Pretrial Conference Documents
2/13/2023	Larry Organ	Communication	0.1	Communication with Mari re witnesses
2/13/2023	Larry Organ	Communication	0.2	Email Exchange with Charles Mahla re testimony
2/13/2023	Larry Organ	Communication	0.2	Email exchange with Diaz Team re stipulation
2/13/2023	Larry Organ	Communication	0.3	Email exchanges with Tesla re stipulation
2/13/2023	Larry Organ	Communication	0.1	Email with Mari re Juror Questionnaire
2/13/2023	Larry Organ	Communication	0.1	Email exchange with Mari Henderson re Juror Questionnaire
2/13/2023	Larry Organ	Communication	0.1	Further email exchange re juror questionnaire with Mari Henderson
2/14/2023	Larry Organ	Plan/ Prepare	0.9	Prepare for strategy meeting
2/14/2023	Larry Organ	Meet	5.2	Attend meeting with Diaz Team to map out strategy for trial

Date	User	Activity	Time	Description
2/14/2023	Larry Organ	Communication	0.1	communication with OC re meet and confer tomorrow
2/14/2023	Larry Organ	Plan/ Prepare	4.7	Prepare for focus group
2/14/2023	Larry Organ	Communication	0.1	communication with Marqui re Diaz strategy
2/15/2023	Larry Organ	Meet	0.5	Meet with Michael, Marqui, & Cimone re stipulations
2/15/2023	Larry Organ	Meet	0.8	Meet with Dan, Mari Asher Michael, Cimone, Marqui and Bernard re stipulations and how to refer to prior trial
2/15/2023	Larry Organ	Meet	0.3	Meet with Diaz team after meeting with OC to discuss strategy
2/15/2023	Larry Organ	Review/ Analyze	0.7	Review Defendant's position outlined in Pretrial Conf. Statement
2/15/2023	Larry Organ	Communication	0.1	email to Mari Henderson re stipulation
2/15/2023	Larry Organ	Draft/ Revise	0.1	Revise stipulation
2/15/2023	Larry Organ	Draft/ Revise	6.1	Review transcripts for incorporation into focus group
2/15/2023	Larry Organ	Draft/ Revise	3.7	Draft new focus group script using depo excerpts
2/15/2023	Larry Organ	Communication	0.1	communication to Sabrina re cutting deposition testimony for focus group
2/15/2023	Larry Organ	Communication	0.2	Email to team sending around the focus group script for review
2/16/2023	Larry Organ	Communication	0.4	Phone conf. with Dustin Collier re focus group survey
2/16/2023	Larry Organ	Communication	0.1	follow up with Dustin about something in the focus group survey
2/16/2023	Larry Organ	Draft/ Revise	2.2	Revisions of focus group script based on feedback from team members
2/16/2023	Larry Organ	Communication	0.1	Meet with Molly and Marqui re strategy
2/16/2023	Larry Organ	Communication	0.1	communication with Dustin re factual issue for focus group
2/16/2023	Larry Organ	Draft/ Revise	2.4	Further Revise focus group script after discussions with team
2/16/2023	Larry Organ	Draft/ Revise	0.6	Revise depo designations to cut time for focus group
2/16/2023	Larry Organ	Communication	0.1	communication with Sabrina re clips for focus group
2/16/2023	Larry Organ	Draft/ Revise	1.8	Additional revisions to Focus Group script
2/16/2023	Larry Organ	Appearance/ Attend	2.2	Moderate Focus Group

Date	User	Activity	Time	Description
2/16/2023	Larry Organ	Meet	0.8	Debrief after focus group
2/17/2023	Larry Organ	Meet	1.2	Meeting to plan and prepare for trial with Diaz Team and make trial assignments
2/17/2023	Larry Organ	Review/ Analyze	1.5	review and analyze materials to prepare for meeting with team
2/17/2023	Larry Organ	Communication	0.1	Phone conf. with Dustin Collier re statements about first verdict
2/18/2023	Larry Organ	Plan/ Prepare	7.7	Prepare for trial - review materials from focus group and exhibits in light of focus group discussion and apply to strategy for retrial
2/18/2023	Larry Organ	Plan/ Prepare	1.6	Prepare for mock examination of Owen Diaz
2/19/2023	Larry Organ	Plan/ Prepare	4	Plan and prepare for direct examination of Owen Diaz
2/19/2023	Larry Organ	Meet	3.9	Meet with Susan, Dustin and Owen to go over direct examination
2/19/2023	Larry Organ	Communication	0.2	Email to Diaz Team re closing argument issues
2/19/2023	Larry Organ	Communication	0.1	Email response form Bernard re closing argument analogies
2/19/2023	Larry Organ	Communication	0.1	Email from Michael Rubin re closing argument analogy
2/19/2023	Larry Organ	Communication	0.2	Email from Dustin Collier re opening statement and punis
2/20/2023	Larry Organ	Draft/ Revise	3.4	Revise direct examination of Owen Diaz
2/20/2023	Larry Organ	Draft/ Revise	2.5	Begin work on opening statement/closing argument - gathering of facts and analysis of prior positions
2/20/2023	Larry Organ	Communication	0.1	Email from Dustin responding to Larry and Michael re closing analogy
2/20/2023	Larry Organ	Communication	0.1	Susan Email re analogy and alternative view
2/20/2023	Larry Organ	Communication	0.1	Liz Malay email re analogy and way to characterize Owen's complaints
2/20/2023	Larry Organ	Communication	0.1	Larry Organ email responding to Liz's analysis and adding additional exhibits to the equation
2/21/2023	Larry Organ	Communication	0.1	email from Bernard Alexander re opening slides
2/21/2023	Larry Organ	Communication	0.1	Email from Susan Organ re opening slides
2/21/2023	Larry Organ	Communication	0.1	Follow up email from Susan with edited slides
2/21/2023	Larry Organ	Review/ Analyze	0.2	Analyze slides created by Susan Organ for opening
2/21/2023	Larry Organ	Plan/ Prepare	5.3	Work on Owen Diaz Direct examination - review related materials

Date	User	Activity	Time	Description
2/22/2023	Larry Organ	Communication	0.2	Phone conf. with Michael Rubin re issues for meeting with OC
2/22/2023	Larry Organ	Meet	0.5	Meet with OC re issues about how to refer to first jury verdict - def. says their are cases supporting their position
2/22/2023	Larry Organ	Meet	0.4	Meet with team after meeting with OC to debrief and make assignments
2/22/2023	Larry Organ	Communication	0.2	Meet with Dustin re focus group
2/22/2023	Larry Organ	Communication	0.1	Email from Bernard re opening slides
2/22/2023	Larry Organ	Communication	0.1	Email from Liz Malay re visuals for opening
2/23/2023	Larry Organ	Communication	0.1	Communication to the parties from Jean Davis re Ex. 380 and Ex. 151
2/23/2023	Larry Organ	Communication	0.1	Response email to court clerk Ms. Davis with Ex. 380 per the court's request
2/23/2023	Larry Organ	Review/ Analyze	0.4	Review various exhibit lists for Ex. 151 or Bates Nos. 819-824 - review produced documents for same
2/23/2023	Larry Organ	Communication	0.1	Email Ms. Davis with Tesla's Anti-Harassment policy (Tesla 819-824) per the court's request
2/23/2023	Larry Organ	Plan/ Prepare	6.5	Prepare for trial - review focus group information and begin drafting script for 2/26 focus group
2/23/2023	Larry Organ	Plan/ Prepare	2.9	Review Owen Diaz testimony to prepare for meeting with Owen Diaz
2/24/2023	Larry Organ	Review/ Analyze	1.1	Review and analyze Draft Preliminary Jury Instructions from the Court and compare with two sides drafts
2/24/2023	Larry Organ	Meet	0.5	Meet with Diaz team to discuss tasks for Monday hearing with the Judge and to discuss draft of jury instructions
2/24/2023	Larry Organ	Draft/ Revise	10.2	Review prior focus group materials and draft new script
2/24/2023	Larry Organ	Communication	0.1	Email to team re latest focus group survey
2/24/2023	Larry Organ	Communication	0.1	communication with Sabrina re filling out form for court reporter
2/25/2023	Larry Organ	Draft/ Revise	5.6	Research factual information regarding Tesla's likely defenses and review prior testimony
2/25/2023	Larry Organ	Communication	0.1	Email to team re focus group survey
2/25/2023	Larry Organ	Communication	0.1	Email to team with revised focus group script
2/25/2023	Larry Organ	Draft/ Revise	1.3	Additional revisions to focus group script
2/25/2023	Larry Organ	Plan/ Prepare	2.5	Plan and prepare for meeting with Owen
2/25/2023	Larry Organ	Communication	0.1	communication from Bernard re revised script

Date	User	Activity	Time	Description
2/26/2023	Larry Organ	Communication	0.1	communication to team re revised focus group script
2/26/2023	Larry Organ	Draft/ Revise	0.8	revise focus group script
2/26/2023	Larry Organ	Meet	3.9	Meet with Owen, Dustin and Susan re trial
2/26/2023	Larry Organ	Appearance/ Attend	3.1	attend and moderate Focus Group
2/26/2023	Larry Organ	Communication	0.7	Meet to debrief with Dustin, Cimone, Susan and Cam re focus group
2/26/2023	Larry Organ	Plan/ Prepare	1.3	Prepare for Pretrial conference
2/26/2023	Larry Organ	Communication	0.2	communication exchange with Michael and Dustin re intent issue
2/27/2023	Larry Organ	Communication	0.1	Communication from Judge Illston's clerk re interest in settlement
2/27/2023	Larry Organ	Communication	0.1	Communication from Sabrina re court reporter
2/27/2023	Larry Organ	Communication	0.1	communication with Cimone re hearing today
2/27/2023	Larry Organ	Communication	0.1	communication with Dustin re hearing today
2/27/2023	Larry Organ	Appearance/ Attend	3.9	Appear for Pretrial Conference with Orrick - our team included Michael Rubin, Dustin Collier and Cimone Nunley and myself with Bernard, Marqui and Sabrina on the livestream
2/27/2023	Larry Organ	Communication	0.2	Phone call with Marqui Hood re hearing issues
2/27/2023	Larry Organ	Communication	0.3	Phone call with Bernard re trial matters and strategy
2/27/2023	Larry Organ	Plan/ Prepare	2.7	Prepare for pretrial conference by reviewing exhibits and witness information and other pretrial documents
2/28/2023	Larry Organ	Communication	0.4	Meet with Cimone and Dustin re focus group and witnesses
2/28/2023	Larry Organ	Plan/ Prepare	4.4	Prepare for witness Diaz examination
2/28/2023	Larry Organ	Plan/ Prepare	3.5	Prepare for Ed Romero examination
2/28/2023	Larry Organ	Communication	0.1	communication with Dustin re Joyce DelaGrande examination
2/28/2023	Larry Organ	Communication	0.4	Phone conf. with Dustin re witnesses
2/28/2023	Larry Organ	Communication	0.1	Phone conf. with Cimone re preparation of Jackson testimony for Bernard
3/1/2023	Larry Organ	Communication	0.9	Phone conf. with Dustin and Josh re framing and defendant's argument
3/1/2023	Larry Organ	Communication	0.1	Email exchange with Dan Posner re having a telephone conf.

Date	User	Activity	Time	Description
3/1/2023	Larry Organ	Communication	0.1	Email from Mari Henderson re remote realtime
3/2/2023	Larry Organ	Communication	0.2	email exchange with Michael re latest document by Tesla re jury instructions
3/2/2023	Larry Organ	Meet	2.9	Strategy Meeting in light of Court's rulings at pretrial conference
3/2/2023	Larry Organ	Communication	0.2	Phone conference with Dan Posner re asking for a demand
3/2/2023	Larry Organ	Draft/ Revise	1.5	Revise Focus Group Script
3/2/2023	Larry Organ	Communication	0.1	communication with Dustin re focus group script
3/2/2023	Larry Organ	Appearance/ Attend	2.1	Appear for Focus Group on tesla defenses
3/2/2023	Larry Organ	Meet	1	Meet with Diaz team to debrief after focus group
3/2/2023	Larry Organ	Plan/ Prepare	3.9	Prepare for trial - review Owen materials for meeting with Owen
3/3/2023	Larry Organ	Communication	0.1	Email to Dan re settlement demand
3/3/2023	Larry Organ	Communication	0.2	Email to Harry Plotkin re jury selection
3/4/2023	Larry Organ	Appearance/ Attend	3.1	Appear for focus group and act as moderator
3/4/2023	Larry Organ	Meet	1.5	Meet with team to debrief from focus group
3/4/2023	Larry Organ	Meet	0.5	meet with Dustin to discuss strategy
3/4/2023	Larry Organ	Plan/ Prepare	2.8	Prepare for focus group - edit script
3/4/2023	Larry Organ	Plan/ Prepare	4	prepare for meeting with Owen
3/5/2023	Larry Organ	Meet	4	Meet with Owen Diaz and Dustin Collier and Emily Kolheim and Susan Organ
3/5/2023	Larry Organ	Communication	0.5	Meet with Dustin to discuss strategy after meeting with Owen
3/5/2023	Larry Organ	Plan/ Prepare	2.4	Prepare for meeting with Owen
3/5/2023	Larry Organ	Draft/ Revise	3.3	work on draft of examination of Owen Diaz
3/5/2023	Larry Organ	Communication	0.1	Email to Mari Henderson re refusal to stipulate to remote access for realtime
3/6/2023	Larry Organ	Plan/ Prepare	12.5	Prepare for trial - prepare Tom Kawasaki direct exam and preempt the cross
3/7/2023	Larry Organ	Plan/ Prepare	5.8	Finish drafting direct examination of Tom Kawasaki

Date	User	Activity	Time	Description
3/7/2023	Larry Organ	Plan/ Prepare	6.8	Prepare for trial - work on Ed Romero examination
3/8/2023	Larry Organ	Meet	1	Meet with Team to discuss strategy and tasks
3/8/2023	Larry Organ	Communication	0.2	Phone conf. with Cimone and Charles Mahla re testimony
3/8/2023	Larry Organ	Plan/ Prepare	6.3	Prepare examination of Ed Romero
3/9/2023	Larry Organ	Communication	0.1	Phone conf. with Dustin re Oppenheimer
3/9/2023	Larry Organ	Communication	0.1	Text messages exchange with Dustin re Oppenheimer testimony
3/9/2023	Larry Organ	Communication	0.4	Phone conf. with Dustin to review powerpoint slides for expert
3/9/2023	Larry Organ	Plan/ Prepare	10.7	Prepare for Ed Romero cross examination
3/9/2023	Larry Organ	Plan/ Prepare	1.4	Additional Romero prep. time
3/9/2023	Larry Organ	Communication	0.1	Communication with Sabrina re exhibits
3/10/2023	Larry Organ	Communication	0.1	Phone conf. with Sabrina re witness examinations and video times
3/10/2023	Larry Organ	Draft/ Revise	0.7	Revise witness timing database
3/10/2023	Larry Organ	Communication	0.1	Phone conf. with Dustin re witness information database and other relevant issues
3/10/2023	Larry Organ	Deposition	0.1	Communication with Sabrina re witness issues
3/10/2023	Larry Organ	Draft/ Revise	1.5	Draft document outlining key information we get from each witness
3/10/2023	Larry Organ	Communication	0.2	communication with Emily Kohlheim re: analyzing Spiro themes from other cases
3/10/2023	Larry Organ	Communication	0.3	Phone conf. with Dustin re strategy issues and timing
3/10/2023	Larry Organ	Communication	0.1	email to Sabrina re witnesses
3/10/2023	Larry Organ	Draft/ Revise	3.4	Revise and add to trial outline of witnesses and key information
3/10/2023	Larry Organ	Review/ Analyze	0.9	Review and edit designation of deposition testimony
3/11/2023	Larry Organ	Plan/ Prepare	7.7	Prepare for trial - review Diaz testimony for cross examination
3/12/2023	Larry Organ	Draft/ Revise	8.5	Revise Ed Romero examination script
3/12/2023	Larry Organ	Draft/ Revise	4.4	Review testimony and Draft Owen Diaz examination outline



Date	User	Activity	Time	Description
3/13/2023	Larry Organ	Plan/ Prepare	4.6	Prepare for trial - work with Owen Diaz to prepare for cross examination
3/13/2023	Larry Organ	Meet	0.8	Meet with Dustin and Susan to edit focus group script
3/13/2023	Larry Organ	Communication	0.1	communication with Michael Rubin re tasks
3/13/2023	Larry Organ	Draft/ Revise	0.4	Revise demonstrative exhibits
3/13/2023	Larry Organ	Draft/ Revise	1.4	Revise focus group script
3/13/2023	Larry Organ	Appearance/ Attend	2.2	Attend focus group
3/13/2023	Larry Organ	Meet	1.2	Meet with Team to debrief re focus group
3/13/2023	Larry Organ	Communication	0.2	Phone conf. with Michael Rubin re tasks for trial
3/13/2023	Larry Organ	Plan/ Prepare	2.6	Additional prep work for meeting with Owen
3/14/2023	Larry Organ	Review/ Analyze	2.6	Review Kawasaki documents to prepare for meeting with Mr. Kawasaki
3/14/2023	Larry Organ	Communication	0.3	Phone conf. with Michael Wheeler re testifying
3/14/2023	Larry Organ	Communication	0.1	Email to Michael Wheeler with standby agreement
3/14/2023	Larry Organ	Communication	0.1	Phone conf. with Owen Diaz re Michael Wheeler
3/14/2023	Larry Organ	Communication	0.1	Email to Michael Wheeler re trial testimony
3/14/2023	Larry Organ	Communication	0.3	Phone Conf. with Dustin Collier and Wayne Jackson
3/14/2023	Larry Organ	Communication	0.2	Phone conf. with Dustin re witnesses
3/14/2023	Larry Organ	Communication	0.1	Phone conf. with Dustin re evidence
3/14/2023	Larry Organ	Appearance/ Attend	0.1	Phone conf. with Owen re LaDrea
3/14/2023	Larry Organ	Communication	0.1	Phone conf. with Sabrina re Ladrea
3/14/2023	Larry Organ	Communication	0.1	Phone conf. with LaDrea re appearance
3/14/2023	Larry Organ	Communication	0.3	Phone conf. with Dustin re trial planning
3/14/2023	Larry Organ	Communication	0.1	Communication with Bernard re timing
3/14/2023	Larry Organ	Communication	0.1	Email with Mari Henderson re witnesses Wheeler and Delgado

Date	User	Activity	Time	Description
3/14/2023	Larry Organ	Communication	0.1	Email response from Posner saying they served Delgado and requesting meet and confer on Wheeler
3/14/2023	Larry Organ	Communication	0.1	Email responding to Posner
3/15/2023	Larry Organ	Meet	3.8	Meet with Tom Kawasaki re testimony and travel to and from Oakland
3/15/2023	Larry Organ	Communication	0.1	Text exchange with Bernard re timing and strategy
3/15/2023	Larry Organ	Communication	0.1	Text exchange with Dustin re strategy issues
3/15/2023	Larry Organ	Review/ Analyze	0.5	Review and analyze rulings on MILs
3/15/2023	Larry Organ	Communication	0.1	Email exchanges re MIIL rulings
3/15/2023	Larry Organ	Appearance/ Attend	0.1	Communication re voir dire transcript
3/15/2023	Larry Organ	Communication	0.1	Email to Sabrina re voir dire transcript from 2021
3/15/2023	Larry Organ	Communication	0.3	Phone conf. with Josh Boxer re Chenoa Chavez
3/15/2023	Larry Organ	Communication	0.2	Phone conf. with Cimone Nunley re Quintero testimony
3/15/2023	Larry Organ	Communication	0.3	Phone conf. with Susan re powerpoint slides
3/15/2023	Larry Organ	Communication	0.1	Email to Bernard re powerpoint slides
3/15/2023	Larry Organ	Communication	0.1	Email with Harry re jury selection issue
3/15/2023	Larry Organ	Communication	0.1	Email from Dan regarding meeting on Wheeler designations
3/15/2023	Larry Organ	Review/ Analyze	0.4	Review powerpoint slides for opening/closing
3/15/2023	Larry Organ	Communication	0.2	Email to susan re powerpoint edits
3/15/2023	Larry Organ	Draft/ Revise	2.6	Revise Kawasaki examination
3/16/2023	Larry Organ	Review/ Analyze	0.4	Review Judge's preliminary jury instructions
3/16/2023	Larry Organ	Communication	0.1	Email exchange with Michael re preliminary jury instructions
3/16/2023	Larry Organ	Draft/ Revise	1.6	Revise Quintero examination
3/16/2023	Larry Organ	Communication	0.1	email from Cimone re Quintero examination
3/16/2023	Larry Organ	Communication	0.2	Email to Cimone asking her to find more references for Quintero examination

Date	User	Activity	Time	Description
3/16/2023	Larry Organ	Communication	0.2	Phone conf. with Cimone about needed changes to Quintero
3/16/2023	Larry Organ	Communication	0.3	Phone conf. with Dustin re witness information
3/16/2023	Larry Organ	Communication	0.1	Phone conf. with Charles Mahla re testimony
3/16/2023	Larry Organ	Communication	0.1	Email with Michael Wheeler regarding testifying
3/16/2023	Larry Organ	Communication	0.2	Phone conf. with Cimone discussing her additions to Quintero script
3/16/2023	Larry Organ	Communication	0.1	Email from Michael Wheeler
3/16/2023	Larry Organ	Communication	0.2	Phone conf. with Owen Diaz re status of case
3/16/2023	Larry Organ	Review/ Analyze	0.3	Review additional edits to Quintero
3/16/2023	Larry Organ	Review/ Analyze	3	Revise and review Romero depo testimony for use on retrial
3/16/2023	Larry Organ	Communication	0.2	Zoom Meet with Dan, Mari, Asher (phone), and Dustin to discuss Michael Wheeler unavailability and need for trial designations
3/16/2023	Larry Organ	Communication	0.1	Phone conf. with Dustin after meeting with Dan re Wheeler
3/16/2023	Larry Organ	Draft/ Revise	1.5	Work with Susan editing opening powerpoint
3/16/2023	Larry Organ	Draft/ Revise	1.7	Revise script for Ed Romero
3/17/2023	Larry Organ	Plan/ Prepare	1.3	Prepare for meeting with Dustin and Bernard
3/17/2023	Larry Organ	Meet	7.1	Meet in person with Bernard and Dustin and rest of team by zoom to discuss trial strategy
3/17/2023	Larry Organ	Communication	0.1	Phone conf. with Wayne Jackson where he said he was en route home and he had to check his calendar for meeting next week
3/17/2023	Larry Organ	Communication	0.1	Email to Wayne Jackson
3/17/2023	Larry Organ	Review/ Analyze	0.6	Review Jackson testimony for sending to Wayne
3/17/2023	Larry Organ	Review/ Analyze	2.9	Analyze defense and plan out antidote
3/17/2023	Larry Organ	Communication	0.2	Email to team re response to planned attack by Tesla
3/18/2023	Larry Organ	Communication	0.4	Communication to trial team re additional thoughts about ways to address Defense tactics
3/18/2023	Larry Organ	Review/ Analyze	1.3	Additional analysis of defenses
3/18/2023	Larry Organ	Communication	1.8	Meet with Team to prepare for focus group

Date	User	Activity	Time	Description
3/18/2023	Larry Organ	Appearance/ Attend	3.1	Appear for focus group
3/18/2023	Larry Organ	Meet	1.7	Debrief after focus group
3/18/2023	Larry Organ	Meet	0.7	Meet with Bernard re strategy
3/19/2023	Larry Organ	Plan/ Prepare	1.9	Think about defenses and defense themes
3/19/2023	Larry Organ	Meet	6.5	Meet with Dustin and Bernard and Susan and Emily re trial strategy including Dr. Reading, Owen, Romero and opening statement and revise witness order
3/19/2023	Larry Organ	Draft/ Revise	0.3	Revise witness order
3/19/2023	Larry Organ	Communication	0.1	Send revised witness order to team
3/19/2023	Larry Organ	Communication	0.1	communication from Dustin Collier to OC re Wheeler
3/19/2023	Larry Organ	Communication	0.1	Email and Phone Message for Wayne Jackson
3/19/2023	Larry Organ	Draft/ Revise	4.8	Revise Owen Examination
3/20/2023	Larry Organ	Communication	0.2	communication to Emily re assignment for Owen cross
3/20/2023	Larry Organ	Communication	0.1	communication to Dustin re cross of Diaz
3/20/2023	Larry Organ	Plan/ Prepare	2.2	Prepare for meeting with Owen
3/20/2023	Larry Organ	Meet	3.8	Meet with Owen, Dustin and Bernard and Susan to prepare owen for cross
3/20/2023	Larry Organ	Meet	4.7	Meet with Michael Wheeler and Dustin and travel to and from Fremont
3/20/2023	Larry Organ	Meet	0.8	Meet with Dustin and Bernard to discuss Opening
3/20/2023	Larry Organ	Review/ Analyze	0.3	Finalize demonstrative exhibits
3/20/2023	Larry Organ	Communication	0.1	Email exchange with Michael Rubin re case matters
3/21/2023	Larry Organ	Plan/ Prepare	3.5	Prepare for meeting with Owen Diaz
3/21/2023	Larry Organ	Meet	4.5	Meet with Owen Diaz and Susan re testimony
3/21/2023	Larry Organ	Draft/ Revise	1.8	revise focus group script
3/21/2023	Larry Organ	Appearance/ Attend	2.2	Focus Group on themes
3/21/2023	Larry Organ	Meet	0.8	Debrief on Focus Group

Date	User	Activity	Time	Description
3/21/2023	Larry Organ	Communication	0.2	communication with Dustin and Sabrina re email to OC exhibit list
3/21/2023	Larry Organ	Communication	0.1	Communication from Court Reporter re realtime
3/21/2023	Larry Organ	Communication	0.1	Communication with Sabrina re Realtime request to court reporter
3/21/2023	Larry Organ	Review/ Analyze	0.9	Review and analyze opening outline
3/21/2023	Larry Organ	Communication	0.2	Email to Bernard re opening ideas
3/22/2023	Larry Organ	Communication	0.1	Email from Mari Henderson re exchange of demonstratives and response thereto
3/22/2023	Larry Organ	Review/ Analyze	0.7	Additional analysis of opening
3/22/2023	Larry Organ	Meet	2.3	Meet with Team re strategy
3/22/2023	Larry Organ	Meet	1.7	Follow up strategy session
3/22/2023	Larry Organ	Review/ Analyze	3	Review and analyze juror questionnaires
3/22/2023	Larry Organ	Meet	2.5	Meet with Harry Plotkin and team to discuss jurors
3/22/2023	Larry Organ	Review/ Analyze	3.8	Review and analyze powerpoints for exchange
3/22/2023	Larry Organ	Communication	0.1	Review email from Asher re Heisen
3/22/2023	Larry Organ	Communication	0.1	Phone call with Emily re Heisen testimony
3/22/2023	Larry Organ	Communication	0.1	communication with Bernard re opening powerpoint
3/22/2023	Larry Organ	Communication	0.1	Communication with Dustin re opening powerpoint
3/23/2023	Larry Organ	Review/ Analyze	2.1	Review and revise opening statement
3/23/2023	Larry Organ	Meet	3	Meet with Tom Kawasaki in Oakland Office and travel to and from Oakland
3/23/2023	Larry Organ	Draft/ Revise	1.4	revise powerpoint slides for defendant
3/23/2023	Larry Organ	Communication	0.2	Phone conf. with Mari and Dan and Dustin re powerpoint slides and defendant's objections to them
3/23/2023	Larry Organ	Review/ Analyze	2.4	Review and analyze opening statement and make suggested edits
3/23/2023	Larry Organ	Review/ Analyze	0.8	Review and analyze defendant's three motions re Oppenheimer, opening slides, and jury instructions
3/23/2023	Larry Organ	Communication	0.1	communication to team re opposing Oppenheimer brief

Date	User	Activity	Time	Description
3/23/2023	Larry Organ	Communication	0.1	communication to team re opposing jury instruction brief and brief on opening demonstrative exhibits
3/23/2023	Larry Organ	Plan/ Prepare	2.7	Additional review of jury venire
3/23/2023	Larry Organ	Review/ Analyze	2	review transcripts of Spiro prior cases
3/24/2023	Larry Organ	Communication	0.1	Mari email re cause challenges asking for our list
3/24/2023	Larry Organ	Communication	0.1	Response email asking for defense list
3/24/2023	Larry Organ	Plan/ Prepare	1.9	Prepare for voir dire issues - review potential jurors
3/24/2023	Larry Organ	Communication	0.1	communication to OC to suggest a meet and confer at 12:30
3/24/2023	Larry Organ	Meet	0.2	Meet with Defense counsel re challenges for cause - they don't have authority to make decisions without consulting with client
3/24/2023	Larry Organ	Communication	0.7	Meet with Team after meeting with OC to discuss strategy
3/24/2023	Larry Organ	Plan/ Prepare	0.3	review and revise response documents to defendants motions
3/24/2023	Larry Organ	Review/ Analyze	3	Review and analyze prior transcripts of Spiro trials
3/24/2023	Larry Organ	Appearance/ Attend	0.9	Appear for hearing with Judge on juror stipulations and then motions by defendant - denied motion re opening slides - denied jury instructions - Oppenheimer he asked for expert report
3/24/2023	Larry Organ	Communication	0.1	Morning phone call with Jono re opposition brief
3/24/2023	Larry Organ	Communication	0.2	Phone call with Dustin re strategy
3/24/2023	Larry Organ	Communication	0.2	Phone conf. with Harry re strategy for voir dire
3/24/2023	Larry Organ	Communication	0.1	Phone conf. with Sabrina re court setup
3/24/2023	Larry Organ	Communication	0.1	Phone conf. with Michael Rubin re strategy question
3/24/2023	Larry Organ	Communication	0.2	Meet with Marqui re help with Owen Diaz examination
3/24/2023	Larry Organ	Review/ Analyze	0.6	Review Def. Objections to Heisen designations and review Emily's research re same
3/24/2023	Larry Organ	Communication	0.3	email to Cimone re preparing a response to Heisen
3/24/2023	Larry Organ	Draft/ Revise	1	Revise Ed Romero examination
3/24/2023	Larry Organ	Draft/ Revise	3.6	Draft focus group script and argument for defense
3/25/2023	Larry Organ	Communication	0.1	Communication with Cimone re trial task

Date	User	Activity	Time	Description
3/25/2023	Larry Organ	Communication	0.1	Phone conf. with Emily re checking discovery
3/25/2023	Larry Organ	Communication	0.1	Email to Marqui re trial task
3/25/2023	Larry Organ	Communication	0.2	Meet with Bernard re opening statement and focus group
3/25/2023	Larry Organ	Communication	0.1	communication with Cimone re focus group
3/25/2023	Larry Organ	Communication	0.2	Meet with LaDrea Jones re testimony
3/25/2023	Larry Organ	Communication	0.1	Meet with Bernard re opening
3/25/2023	Larry Organ	Appearance/ Attend	2.4	Attend focus group
3/25/2023	Larry Organ	Meet	1.8	Meet with team to rework opening statement
3/25/2023	Larry Organ	Plan/ Prepare	2.5	Prepare for focus group - write script for Spiro-type opening
3/25/2023	Larry Organ	Review/ Analyze	0.3	Review and analyze Heisen response email
3/25/2023	Larry Organ	Review/ Analyze	0.5	Review and analyze research on discovery responses re treating doctors
3/25/2023	Larry Organ	Plan/ Prepare	6.2	Prepare for trial - draft witness examinations and review examinations of other and review edit opening statement
3/26/2023	Larry Organ	Plan/ Prepare	1.7	Prepare for meeting with Owen Diaz
3/26/2023	Larry Organ	Meet	3	Meet with Owen, Dustin and Susan to discuss testimony
3/26/2023	Larry Organ	Meet	0.5	Meet with Bernard to revise opening
3/26/2023	Larry Organ	Draft/ Revise	2	Revise opening statement and focus group re same
3/26/2023	Larry Organ	Communication	0.9	Zoom meeting with Tom Kawasaki re likely cross
3/26/2023	Larry Organ	Draft/ Revise	0.7	Revise Kawasaki examination
3/26/2023	Larry Organ	Plan/ Prepare	3.9	Prepare for trial - review relevant documents for trial prep
3/26/2023	Larry Organ	Communication	0.1	Email to Mari re witnesses this week
3/26/2023	Larry Organ	Communication	0.1	Communication with Dustin re witnesses
3/26/2023	Larry Organ	Review/ Analyze	1.5	Review and revise Owen Diaz examination
3/27/2023	Larry Organ	Appearance/ Attend	11.2	Appear for Trial Day 1 - Jury Selection - Opening Statements - Plaintiff 56 min., Def. 26 min.

Date	User	Activity	Time	Description
3/27/2023	Larry Organ	Draft/ Revise	1.9	Meet with Staff to discuss Openings and strategy
3/27/2023	Larry Organ	Draft/ Revise	3	Revise examinations of Kawasaki and Martinez
3/28/2023	Larry Organ	Appearance/ Attend	7.7	Trial Day 2 - Tom Kawasaki, Michael Wheeler, Wayne Jackson, Amy Oppenheimer Direct - and travel to and from court
3/28/2023	Larry Organ	Plan/ Prepare	0.9	Meet with Owen after court
3/28/2023	Larry Organ	Meet	3.6	Meet with Team re strategy
3/28/2023	Larry Organ	Review/ Analyze	0.3	Review Draft Final Jury Instructions
3/28/2023	Larry Organ	Review/ Analyze	0.1	Review draft verdict form
3/28/2023	Larry Organ	Plan/ Prepare	3.1	Prepare for Romero and Diaz examinations
3/29/2023	Larry Organ	Plan/ Prepare	0.8	Prepare before court for Romero
3/29/2023	Larry Organ	Appearance/ Attend	8	Appear for Day 3 - Oppenheimer cross, Ed Romero cross, Marconi video, Ramon Martinez Direct (no cross by Tesla), Owen Direct, Cross started and travel to and from San Francisco
3/29/2023	Larry Organ	Plan/ Prepare	0.2	Prepare for jury instruction meeting
3/29/2023	Larry Organ	Appearance/ Attend	0.8	Appear for Afternoon hearing on jury instructions
3/29/2023	Larry Organ	Meet	2.2	Meet with Team re strategy
3/29/2023	Larry Organ	Plan/ Prepare	3.7	Prepare for Owen Diaz cross and review daily and prepare for Chavez and review filings
3/30/2023	Larry Organ	Appearance/ Attend	7.5	Appear for Day 4 of trial - Owen Cross & Redirect, Dr. Reading, Demetric, LaDrea and travel to and from San Francisco
3/30/2023	Larry Organ	Plan/ Prepare	1.4	Strategy Meeting after court
3/30/2023	Larry Organ	Plan/ Prepare	7	Prepare for closing argument
3/30/2023	Larry Organ	Communication	0.2	Phone conf. with Charles Mahla re testimony and timing
3/31/2023	Larry Organ	Appearance/ Attend	11.4	Appear for Day 5 of trial - Mahla, discovery, plaintiff rests, Jackie Delgado, Joyce DelaGrande - lunch - closing arguments - jury deliberations - travel to and from San Francisco
4/2/2023	Larry Organ	Review/ Analyze	0.7	Review and analyze Spiro closing
4/2/2023	Larry Organ	Communication	0.2	Phone conf. with Cimone re Spiro closing
4/2/2023	Larry Organ	Meet	0.5	Meet with Michael Rubin, Bernard Alexander, Jono Rosenthal re post-trial strategy



Date	User	Activity	Time	Description
4/3/2023	Larry Organ	Appearance/ Attend	8.4	Appear for Jury Deliberations - meet with team after verdict - travel to and from San Francisco
4/5/2023	Larry Organ	Meet	1.2	Meet with Diaz trial team to discuss strategy and post-trial tasks - Marqui will contact jurors - Cimone will work on attorney's fees motion - Jono will look at additur and post-trial briefing issues
4/5/2023	Larry Organ	Communication	0.1	Phone conf. with Cimone re attorney's fees motion
4/5/2023	Larry Organ	Communication	0.3	Phone conf. with Dustin re factual issues relating to case
4/5/2023	Larry Organ	Communication	0.1	Phone conference with Michael Rubin re post-trial discussion
4/5/2023	Larry Organ	Communication	0.4	Phone conference with Dustin Collier re current strategy
4/10/2023	Larry Organ	Communication	0.1	Phone call with Dustin Collier
4/10/2023	Larry Organ	Communication	0.1	Communication with Michael Rubin re judgment
4/24/2023	Larry Organ	Communication	0.3	Phone conf. with Michael Rubin re new trial motion
4/25/2023	Larry Organ	Communication	0.1	Phone conf. with Owen Diaz re new trial motion
4/28/2023	Larry Organ	Communication	0.1	Phone conf. with Marqui re Diaz and jury
4/30/2023	Larry Organ	Communication	0.2	Phone conf. with Bernard Alexander re Motion for New Trial
5/2/2023	Larry Organ	Communication	0.4	Email from Marqui with interview of Juror 22 and review interview notes
5/2/2023	Larry Organ	Communication	0.2	Phone conf. with Marqui Hood re juror declaration
5/2/2023	Larry Organ	Communication	0.1	Phone conf. with Jono Rosenthal re juror declaration
5/2/2023	Larry Organ	Communication	0.3	Email exchange re juror declaration with Trial Team
5/2/2023	Larry Organ	Communication	0.5	Phone conf. with Cimone re juror declaration and implications for motion for new trial
5/2/2023	Larry Organ	Communication	0.2	Phone conf. with Cimone and Marqui re juror declaration
5/3/2023	Larry Organ	Communication	0.3	Email exchange with Team re juror declaration and New Trial Motion
5/3/2023	Larry Organ	Communication	0.2	Phone conf. with Marqui Hood re juror declaration
6/8/2023	Larry Organ	Communication	0.1	communication with Michael Rubin re Supreme Court case on Alabama redistricting and implications for our case
6/14/2023	Larry Organ	Plan/ Prepare	1.8	Prepare for meeting with Michael Rubin re Reply brief
6/14/2023	Larry Organ	Meet	1	Meet with Cimone, Michael and Corrine re reply brief

Date	User	Activity	Time	Description
6/22/2023	Larry Organ	Communication	0.1	Communication exchange with Marqui re reply brief
6/27/2023	Larry Organ	Review/ Analyze	1.8	Review and revise reply brief re New Trial/Mistrial
7/25/2023	Larry Organ	Draft/ Revise	3.5	Review and edit declarations for attorney's fees motion
7/25/2023	Larry Organ	Communication	0.3	Communication with Michael Rubin re attorney's fees motion
8/4/2023	Larry Organ	Communication	0.1	Communication with Cimone re discovery abuse
8/4/2023	Larry Organ	Review/ Analyze	2.1	Review discovery requests and responses and court orders re discovery of graffiti and Ex. 109 compared to new documents produced in vaughn
8/4/2023	Larry Organ	Draft/ Revise	0.2	Draft email toTesla counsel re new graffiti document
8/4/2023	Larry Organ	Draft/ Revise	0.1	Review edits from Michael and made additional edits
8/4/2023	Larry Organ	Communication	0.1	Email Tesla counsel re discovery abuse
8/4/2023	Larry Organ	Communication	0.1	Communication to Tesla counsel re newly discovered document re N-word that was not produced in discovery in Diaz
8/4/2023	Larry Organ	Review/ Analyze	0.4	Review draft brief from Cimone re newly discovered document
8/5/2023	Larry Organ	Communication	0.3	Phone conf. with Michael Rubin re newly discovered document
8/5/2023	Larry Organ	Communication	0.1	Text to Michael Rubin re briefing
8/5/2023	Larry Organ	Communication	0.3	Phone conf. with Michael Rubin re discovery abuse issues by Tesla
8/5/2023	Larry Organ	Review/ Analyze	0.6	Review Owen Diaz trial testimony re graffiti
8/5/2023	Larry Organ	Communication	0.1	Email to Michael Rubin and Cimone Nunley re Owen Testimony re graffiti
8/5/2023	Larry Organ	Review/ Analyze	0.9	Review and analyze Andre Donet testimony re graffiti
8/5/2023	Larry Organ	Communication	0.1	Email to Michael Rubin and Cimone Nunley re Donet testimony re graffiti policies
8/5/2023	Larry Organ	Communication	0.1	Phone conf. with Michael Rubin re briefing on graffiti
8/5/2023	Larry Organ	Communication	0.1	Phone conf. with Owen Diaz re case update
8/6/2023	Larry Organ	Communication	0.3	Phone conf. with Michael Rubin re presentation of evidence to Judge Orrick
8/6/2023	Larry Organ	Communication	0.1	Phone conf. with Cimone re notice of new evidence to be filed
8/6/2023	Larry Organ	Communication	0.1	Follow up with Cimone re notice of new evidence

Date	User	Activity	Time	Description
8/6/2023	Larry Organ	Communication	0.1	Follow up call with Michael Rubin re notice of new evidence
8/6/2023	Larry Organ	Draft/ Revise	1.3	Revise new evidence brief and review relevant evidence
8/7/2023	Larry Organ	Communication	0.5	Phone conf. with Michael Rubin re motion re evidence
8/7/2023	Larry Organ	Communication	0.3	Phone conf. with Cimone Nunley re motion re new evidence
8/8/2023	Larry Organ	Communication	0.1	Phone conf. with Cimone and Michael re court's order
8/8/2023	Larry Organ	Review/ Analyze	0.2	Review and analyze documents to be submitted to court on evidence
8/8/2023	Larry Organ	Communication	0.1	communication to Michael Rubin re materials to be submitted to court
8/8/2023	Larry Organ	Review/ Analyze	0.1	Review court's order re additional documents
8/15/2023	Larry Organ	Communication	0.1	Email from Michael Rubin re Quinn Emanuel rates
8/15/2023	Larry Organ	Communication	0.1	Email to Sabrina Grislis re Quinn rates
8/15/2023	Larry Organ	Review/ Analyze	2.7	Review and analyze Tesla's opposition papers and review transcripts and exhibits to rebut statements therein
8/15/2023	Larry Organ	Communication	0.3	Phone conf. with Cimone re strategy
8/16/2023	Larry Organ	Communication	0.1	Email re argument on prejudice
8/16/2023	Larry Organ	Meet	0.5	Meet with Michael, Cimone, Molly, Marqui and Sabrina re tasks for reply brief
8/16/2023	Larry Organ	Review/ Analyze	0.3	Review emails for positions of various individuals identified in previously undisclosed evidence
8/16/2023	Larry Organ	Communication	0.1	Communication with Cimone re strategy
8/16/2023	Larry Organ	Draft/ Revise	0.2	Draft statements for declaration ISO notice of new evidence
8/16/2023	Larry Organ	Draft/ Revise	0.5	Review and revise draft reply brief ISO notice of new evidence
8/16/2023	Larry Organ	Review/ Analyze	0.6	Review and edit reply papers ISO notice of new evidence
8/16/2023	Larry Organ	Communication	0.1	Email re changes to reply papers ISO notice of new evidence
8/17/2023	Larry Organ	Communication	0.2	communication with Michael and Marqui re reply papers ISO notice of new evidence
10/4/2023	Larry Organ	Review/ Analyze	0.8	Review Court's denial of motion for mistrial/new trial
10/4/2023	Larry Organ	Meet	0.9	Meet with Diaz team re strategy and fees motion

Date	User	Activity	Time	Description
10/4/2023	Larry Organ	Communication	0.2	Phone conf. with Owen Diaz re court's ruling

<b>Date</b>	<b>User</b>	<b>Activity</b>	<b>Time</b>	<b>Description</b>
1/2/2020	Susan Organ	Meet	0.6	Meet with Larry Organ, Navruz Avloni, Bernard Alexander, and Cimone Nunely regarding mandatory settlement conference and strategy
2/13/2020	Susan Organ	Communication	1.1	Phone call with Larry Organ, Bernard Alexander, Cimone Nunley, Navruz Avloni, and jury consultant Harry Plotkin regarding trial strategy and preparation
2/21/2020	Susan Organ	Communication	0.2	Discuss upcoming tasks with Cimone Nunley
3/3/2020	Susan Organ	Communication	0.3	Discuss cast of characters with Cimone Nunley
3/10/2020	Susan Organ	Meet	1.2	Meet with Cimone Nunley, Larry Organ, and Sabrina Grislis to discuss case status and upcoming to do items
3/13/2020	Susan Organ	Plan/ Prepare	3.5	Review exhibits for relevance and foundation, prepare exhibit list
3/13/2020	Susan Organ	Meet	1	Meet with Larry Organ, Bernard Alexander, Harry Plotkin, and Cimone Nunley regarding MILs, jury selection, upcoming tasks
3/15/2020	Susan Organ	Plan/ Prepare	4.2	Prepare exhibit list
3/24/2020	Susan Organ	Meet	0.7	Telephone meeting with Bernard Alexander, Larry Organ, and Cimone Nunley to discuss pre-trial tasks and strategy
4/6/2020	Susan Organ	Communication	0.8	Discuss demonstrative exhibits with Larry Organ
4/10/2020	Susan Organ	Meet	0.5	Telephone meeting with Larry Organ, Navruz Avloni, Bernard Alexander, and Cimone Nunley regarding trial tasks and strategy
4/17/2020	Susan Organ	Meet	2.1	Meet with Harry Plotkin, Larry Organ, Bernard Alexander, Navruz Avloni, Cimone Nunley, and Sabrina Grislis to discuss trial, themes

4/29/2020	Susan Organ	Communication	0.3	Phone call with Cimone Nunley regarding copy editing done to MIL oppositions
6/16/2020	Susan Organ	Plan/ Prepare	1.6	Brainstorm ideas for themes with Larry Organ
6/17/2020	Susan Organ	Meet	1.6	Meet with Harry Plotkin, Larry Organ, Bernard Alexander, Cimone Nunley, and Sabrina Grislis regarding themes for trial and tasks
7/29/2020	Susan Organ	Meet	0.7	Meet with Larry Organ, Bernard Alexander, Cimone Nunley, Sabrina Grislis, and Mika Hilaire regarding the focus group
8/6/2020	Susan Organ	Meet	1.3	Meet with Mika Hilaire, Harry Plotkin, Larry Organ, Navruz Avloni, Cimone Nunley, and Sabrina Grislis regarding the focus group
8/14/2020	Susan Organ	Meet	0.5	Meet with Larry Organ, Cimone Nunley, and Sabrina Grislis regarding focus group
8/15/2020	Susan Organ	Appearance/ Attend	4	Attend focus group
8/15/2020	Susan Organ	Meet	0.9	Post focus group meeting and debrief with Harry Plotkin, Dustin Collier, and trial team
8/19/2020	Susan Organ	Meet	1.6	Meet with Harry Plotkin and trial team to discuss themes and strategy post focus group
10/23/2020	Susan Organ	Meet	0.9	Meet with team to discuss trial themes and issues
11/2/2020	Susan Organ	Meet	1	Meet with Larry Organ, Bernard Alexander, Cimone Nunley, Navruz Avloni to discuss strategy for trial and mediation
7/19/2021	Susan Organ	Meet	1.7	Meet with Client and team to discuss case, ed, and lost wages
9/5/2021	Susan Organ	Appearance/ Attend	4.1	Attend Focus Group - 2 sessions
9/5/2021	Susan Organ	Meet	0.4	Meet with Larry Organ, Navruz Avloni, Sabrina Grislis, and Cimone Nunley after focus groups to debrief
9/5/2021	Susan Organ	Plan/ Prepare	1	Prepare for the second focus group panel

9/5/2021	Susan Organ	Plan/ Prepare	1.1	Prepare for the first focus group panel
9/9/2021	Susan Organ	Meet	4.9	Meet with client Owen Diaz and Larry Organ, Cimone, Bernard to prepare for trial
9/10/2021	Susan Organ	Meet	1.3	Meet with Larry Organ, Bernard Alexander, Navruz Avloni, Cimone Nunley, and Sabrina Grislis regarding trial and preparation
9/13/2021	Susan Organ	Plan/ Prepare	4.9	Meet with Owen Diaz to prepare him for trial
9/15/2021	Susan Organ	Meet	1	Meet with Bernard Alexander, Larry Organ, and Cimone Nunley regarding trial prep and witnesses
9/15/2021	Susan Organ	Communication	0.5	Discussion with Larry Organ and Cimone Nunley regarding testimony from Jackelin Delgado and Veronica Martinez
9/16/2021	Susan Organ	Meet	1	Meet with Larry Organ, Bernard Alexander, and Cimone Nunley regarding witnesses for trial
9/18/2021	Susan Organ	Meet	1.4	Meet with Michael Wheeler with Larry Organ and Bernard Alexander to prepare for trial testimony
9/19/2021	Susan Organ	Meet	1.5	Meet with Larry Organ, Bernard Alexander, and Cimone Nunley to prepare for opening statement
9/24/2021	Susan Organ	Meet	0.5	Meet with Larry Organ to discuss Erin Marconi's testimony
9/24/2021	Susan Organ	Meet	0.4	Meet with Larry Organ and Sabrina Grislis regarding demonstrative exhibits
9/27/2021	Susan Organ	Meet	0.6	Meet with Larry Organ, Bernard Alexander, Cimone Nunley, and Sabrina Grislis regarding additional tasks
9/29/2021	Susan Organ	Meet	0.8	Meet with team to strategize for witnesses during lunch
9/30/2021	Susan Organ	Meet	2.2	Meet with Larry Organ, Bernard Alexander, Cimone Nunley, Navruz Avloni, and Sabrina Grislis to discuss remaining tasks and strategy

9/30/2021	Susan Organ	Communication	0.1	Call with Jean Ger regarding strategy
10/1/2021	Susan Organ	Meet	3	Meet with Larry Organ, Bernard Alexnader, Navruz Avloni, and Cimone Nunley to prepare for closing argument presentation
10/1/2021	Susan Organ	Communication	0.3	Discussion with Navruz Avloni regarding trial strategy
10/2/2021	Susan Organ	Meet	0.7	Meet with Navruz Avloni and Cimone Nunley to discuss closing statement powerpoint
10/3/2021	Susan Organ	Meet	2	Meet with Larry Organ, Navruz Avloni, Cimone Nunley, and Sabrina Grislis to prepare for rebuttal arguments
10/3/2021	Susan Organ	Meet	0.4	Meet with Bernard Alexander, Larry Organ, and Navruz Avloni to discuss rebuttal ideas and exhibit 106



# Exhibit 3

EXHIBIT 3: BASE LODESTAR WITH MULTIPLIERS													
Biller	Hourly Rate	Hours before 10/5/21	w/2x Multiplier	Hours 10/6/21-2/6/22	Fees on Fees for 10/6/21-2/6/22	w/1.5 multiplier	Hours after 2/6/22	Fees on Fees after 2/6/22	w/1.2 multiplier	Fees-on-fees hours	Fees on Fees total w/ 0 multiplier	Total Hours	Total from Biller
Michael Rubin	\$1,275	0	\$0	114.3	5.8	\$207,506.25	382.3	4.5	\$578,034.0	10.3	\$13,132.50	496.6	\$798,672.75
Jonathan Rosenthal	\$650	0	\$0	134.85		\$131,478.75	479.8		\$374,244.0			614.65	\$505,722.75
Corinne Johnson	\$825	0	\$0	0	0	\$0.00	196.4	0.3	\$194,139.0	0.3	\$247.50	196.4	\$194,386.50
Sam Hull	\$550	0	\$0	0		\$0.00	15.7		\$10,362.0			15.7	\$10,362.00
Althshuler Berzon Clerks/Paralegals	\$325	0	\$0	6.5		\$3,168.75	84.7		\$33,033.0			91.2	\$36,201.75
Bernard Alexander	\$1,200	606.75	\$1,456,200	69.4	5.2	\$115,560.00	291.45	3.7	\$414,360.0	8.9	\$10,680.00	967.6	\$1,996,800.00
Britt Karp	\$675	25.1	\$33,885	0		\$0.00	13.9	2.2	\$9,477.0	2.2	\$1,485.00	39	\$44,847.00
Natalie Khoury	\$350	0	\$0	44.5		\$23,362.50	5.4		\$2,268.0			49.9	\$25,630.50
Gus Ham (Paralegal)	\$225	48.4	\$21,780	0		\$0.00	0		\$0.0			48.4	\$21,780.00
Lawrence Organ	\$975	1371.5	\$2,674,425	108.4	1.6	\$156,195.00	876.5	8.2	\$1,015,911.0	9.8	\$9,555.00	2356.4	\$3,856,086.00
Marqui Hood	\$900	0	\$0	0		\$0.00	128	0.8	\$137,376.0	0.8	\$720.00	128	\$138,096.00
Molly Durkin	\$750	0	\$0	0		\$0.00	46.2		\$41,580.0			46.2	\$41,580.00
Navruz Avloni	\$725	434.2	\$629,590	14		\$15,225.00	0		\$0.0	0.8	\$580.00	449	\$645,395.00
Cimone Nunley	\$500	1015	\$1,015,000	244.9	73.2	\$128,775.00	258.8	55.4	\$122,040.0	128.6	\$64,300.00	1518.7	\$1,330,115.00
Emily Kohlheim	\$425	19.5	\$16,575	0.3		\$191.25	55.6		\$28,356.0			75.4	\$45,122.25
Noah Baron	\$375	21	\$15,750	0		\$0.00	0		\$0.0			21	\$15,750.00
CCRLG Clerks/Paralegals	\$225	410.1	\$184,545	33.9	7.8	\$8,808.75	296	3.2	\$79,056.0	11	\$2,475.00	740	\$274,884.75
Dustin Collier	\$750	0	\$0	0		\$0.00	272.93	0.3	\$245,367.0	0.3	\$225.00	272.93	\$245,592.00
V. Joshua Socks	\$700	0	\$0	0		\$0.00	83.1		\$69,804.0			83.1	\$69,804.00
Drew Teti	\$550	0	\$0	0		\$0.00	40.9		\$26,994.0			40.9	\$26,994.00
Elizabeth Malay	\$400	0	\$0	0		\$0.00	187.4		\$89,952.0			187.4	\$89,952.00
TOTAL HOURS		3951.55		771.05	93.6		3715.1	78.6			\$103,400.00	8438.48	
TOTAL			\$6,047,750			\$790,271.25			\$3,472,353.0				TOTAL
									Total fees on fees hours	173	Total fees on fees \$	\$103,400.00	\$10,413,774.25

# Exhibit 4

Date	Type	Total	Description
9/21/2017	Travel Expense	\$28.00	Larry parking for meeting with Owen Diaz
5/15/2018	Appearance/Attend	\$36.00	LAZ parking - Larry parking for Owen's deposition
5/15/2018	Travel Expense	\$27.24	Larry Organ travel and return to SF
5/15/2018	Travel Expense	\$26.30	Larry Organ lunch at Manhattan Hub
5/22/2018	Travel Expense	\$36.00	Diaz depo parking LAZ parking
5/22/2018	Travel Expense	\$27.24	GGB toll plus travel to SF
5/22/2018	Travel Expense	\$53.36	Larry Organ LA appearance, restaurant
6/11/2018	Travel Expense	\$36.00	Larry Organ parking at mediation (LAZ Parking)
6/11/2018	Travel Expense	\$34.00	Ramzi Nimr mediation parking
6/11/2018	Travel Expense	\$20.28	Ramzi travel to mediation 13.1 miles and Bay Bridge
9/4/2018	Travel Expense	\$12.00	Navruz Avloni parking at Further CMC (Civic Center parking)
9/7/2018	Appearance/ Attend	\$30.00	CMC conference CourtCall
10/16/2018	Travel Expense	\$74.68	Lunch at Billy's Snacks and Deli during mediation (LO)
10/16/2018	Travel Expense	\$16.00	Navruz Avloni parking for mediation
12/3/2018	Travel Expense	\$36.00	Larry Organ parking during Owen Diaz
12/4/2018	Travel Expense	\$36.00	Navruz Avloni parking for Demetric Di-az depo
12/16/2018	Travel Expense	\$25.00	Navruz Avloni parking for Monica Deleon depo
6/7/2019	Travel Expense	\$35.00	Navruz Avloni parking - M&C with Sheppard Mullin
6/17/2019	Travel Expense	\$20.00	Navruz Avloni parking at Lake Merritt Tower for Titus McCaleb deposition preparation meeting
6/18/2019	Travel Expense	\$3.75	Navruz Avloni parking with CSJ Smart Meters during Titus McCaleb depo
6/18/2019	Travel Expense	\$37.86	Navruz Avloni lunch with McCaleb during depo
6/20/2019	Travel Expense	\$18.00	LaDrea Jones parking fee for deposition (paid by Navruz Avloni)
6/20/2019	Travel Expense	\$14.00	Navruz Avloni parking fee for LaDrea Jones' deposition
6/21/2019	Travel Expense	\$24.00	Navruz Avloni parking during Demetrica depo
7/26/2019	Travel Expense	\$20.00	Navruz Avloni parking during Lamar Patterson depo

Date	Type	Total	Description
7/29/2019	Travel Expense	\$36.75	Navruz Avloni lunch with Lamar during depo
9/9/2019	Travel Expense	\$35.00	Navruz Avloni parking during M&C with OC
9/13/2019	Travel Expense	\$24.21	Sabrina Grislis travel to SF for personal service (18.1 miles, 7.25 bridge toll, 6 parking)
9/13/2019	Travel Expense	\$24.00	Navruz Avloni parking M&C with OC
10/1/2019	Travel Expense	\$505.96	Client Owen Diaz flight to Burbank for expert
10/9/2019	Travel Expense	\$18.00	Larry Organ Parking during Kawasaki deposition
10/14/2019	Travel Expense	\$535.96	Larry Organ airfare for Erin Marconi deposition in Los Angeles
10/15/2019	Travel Expense	\$24.00	Larry Organ Parking at Oakland office Veronica Martinez deposition
10/21/2019	Travel Expense	\$21.29	Larry Organ meal in Los Angeles during Erin Marconi deposition
10/21/2019	Travel Expense	\$53.94	Larry Organ Bell Cab in Los Angeles for Marconi depo
10/21/2019	Travel Expense	\$17.39	Larry Organ meal at LAX for Marconi depo
10/21/2019	Travel Expense	\$38.00	Larry Organ airport parking at OAK to LAX
10/22/2019	Travel Expense	\$37.85	Larry Organ Uber travel in Los Angeles for Marconi depo
10/22/2019	Travel Expense	\$7.57	Larry Organ Uber travel in Los Angeles for Marconi depo
10/22/2019	Travel Expense	\$16.60	Larry Organ travel meal at airport
10/23/2019	Travel Expense	\$9.00	Larry Organ parking UC Hastings Garage during MSJ hearing
12/17/2019	Travel Expense	\$68.48	Cimone Nunley mileage to MSJ hearing
1/16/2020	Appearance/ Attend	\$20.00	Larry Organ Parking MSC
1/16/2020	Travel Expense	\$73.37	Cimone Nunley and Larry Organ Uber back to San Anselmo after MSC
3/10/2020	Travel Expense	\$66.50	Larry Organ parking for Amy Oppenheimer depo in SF on March 9 (had to move car)
3/18/2020	Appearance/ Attend	\$30.00	Larry Organ Court Call for 3.10 Call with Judge Orrick re possible new trial dates
9/14/2021	Travel Expense	\$2,291.75	San Anselmo Inn fee for Cimone Nunley's stay during trial
9/24/2021	Travel Expense	\$120.00	Sabrina Grislis parking at UC Hastings garage for trial: 9/24, 27, 28, 29; 10/1, 4
9/24/2021	Travel Expense	\$140.00	Larry Organ parking at UC Hastings garage for trial (9/24, 27, 28, 29, 30; 10/1, 4)

Date	Type	Total	Description
9/24/2021	Travel Expense	\$99.00	Navruz Avloni parking during trial on 9/24, 27, 30; 10/1, 4
3/6/2023	Travel Expense	\$1,328.25	Marqui Hood stay at San Anselmo Inn during trial
3/6/2023	Travel Expense	\$1,695.75	Cimone Nunley stay at San Anselmo Inn during trial
3/22/2023	Travel Expense	\$118.02	Cameron Hartquist meal purchase: lunch for trial team during prep meeting
3/24/2023	Travel Expense	\$24.00	Parking cost for dropping off trial binders at courthouse
3/26/2023	Travel Expense	\$57.60	Purchase of snacks during trial
3/27/2023	Travel Expense	\$185.94	Lunch for trial team day 1
3/28/2023	Travel Expense	\$177.86	Lunch for trial team day 2, purchased by Teodora Gagauz
3/29/2023	Travel Expense	\$143.13	Trial day 3, lunch for trial team
3/29/2023	Travel Expense	\$185.68	Cimone Nunley purchase of dinner for trial team, Sol Food
3/30/2023	Travel Expense	\$284.92	Trial day 4, lunch for trial team
3/31/2023	Travel Expense	\$110.00	Sabrina Grislis parking costs for trial: \$22/day for 3/27-31
4/3/2023	Travel Expense	\$98.00	Cimone Nunley parking costs at trial: \$22/day for 3/27, 3/28 3/31; \$32/day for 4/3
4/3/2023	Travel Expense	\$120.00	Larry Organ parking costs for 6 days at trial: \$20/day
4/3/2023	Travel Expense	\$142.00	Emily Kohlheim parking costs for attending trial: \$22/day for 3/27, 28, 28, 31, 4/3. \$32/day for 3/30
4/18/2023	Travel Expense	\$131.32	Cimone Nunley mileage reimbursement for travel related to trial: 37.3 miles RT and \$8.40 bridge toll/day for 4 days.
		<b>\$9,843.80</b>	<b>TOTAL TRAVEL EXPENSES</b>

Date	Type	Total	Description
6/13/2018	Other	\$4,602.50	Dr. Bruce Smith (reduced by 50%) Michael Robbins expert retainer
6/19/2019	Other	\$6,000.00	EXTTI, Inc.
7/11/2019	Expert Witness	\$4,500.00	Michael Robbins invoice Invoice number 15912
10/1/2019	Expert Witness	\$10,000.00	Amy Oppenheimer Retainer for expert report (See Invoice 10472)
10/02/2019	Expert Witness	\$2,500.00	Dr. Anthony E. Reading Retainer (\$2,500)- Advanced
10/2/2019	Expert Witness	\$2,500.00	Dr Anthony Reading expert fee
10/21/2019	Expert Witness	\$5,438.00	Amy Oppenheimer expert witness fee remaining after retainer
10/31/2019	Expert Witness	\$5,392.50	Charles Mahla/Econ One, Invoice # 17568
11/2/2019	Expert Witness	\$905.00	Anthony Reading invoice, report preparation
11/30/2019	Expert Witness	\$3,548.55	Charles Mahla/Econ One, Invoice # 17710
2/29/2020	Expert Witness	\$5,575.60	Charles Mahla/Econ One, Invoice No. 18071
2/29/2020	Expert Witness	\$1,120.00	Charles Mahla/Econ One, Invoice no. 18071DEPO
3/10/2020	Expert Witness	\$675.00	Anthony Reading, PhD deposition preparation bill (even split with AMF, LLP)
3/10/2020	Expert Witness	\$3,000.00	Amy Oppenheimer invoice 10627
03/12/2020	Expert Witness	\$675	Dr. Anthony Reading Payment
3/13/2020	Expert Witness	\$4,548.00	Amy Oppenheimer Invoice 10639 for \$4548
04/09/2020	Expert Witness	\$1,125.00	Dr. Reading CHECK 8702 4.09.2020 (Advanced)
09/02/2020	Expert Witness	\$923.19	Expert, Anthony E. Readings, PhD 1.02.2020 (Advanced)
9/24/2021	Jury Consultant	\$13,640.54	Harry Plotkin jury consultant. All work up to trial 1
10/12/2021	Expert Witness	\$8,640.00	Amy Oppenheimer Invoice no. 1440, expert testimony/preparation in the Diaz trial.
10/12/2021	Expert Witness	\$4,307.50	Charles Mahla/Econ One, Invoice no. 20674, expert testimony and preparation in the Diaz trial
10/14/2021	Expert Witness	\$8,210.00	Dr. Anthony Reading Final Statement 10.14.21- Adv. 11.11.21
2/28/2023	Expert Witness	\$1,590.00	Charles Mahla/Econ One, invoice no. 23458, report prep
3/27/2023	Jury Consultant	\$15,490.39	Harry Plotkin jury consultant. All work up to trial 2
3/31/2023	Expert Witness	\$3,080.00	Charles Mahla/Econ One, invoice no. 23664, testimony and prep
3/31/2023	Expert Witness	\$9,480.00	Amy Oppenheimer, OIG trial 2 invoice
4/1/2023	Expert Witness	\$10,710.81	Dr Anthony Reading, trial 2 invoice
		<b>\$138,177.58</b>	<b>TOTAL EXPERT WITNESS EXPENSES</b>

Date	Type	Total	Description
4/30/2018	Postage/Delivery	\$63.95	Postal Service Plus
5/1/2018	Postage/Delivery	\$63.95	Postal Service Plus
5/18/2018	Postage/Delivery	\$16.00	USPS receipt
5/24/2018	Postage/Delivery	\$16.00	Postage to Los Angeles, San Jose
8/31/2018	Postage/Delivery	\$18.05	FedEx charge
10/12/2018	Postage/Delivery	\$13.60	CMRs to Los Angeles and Sacramento
12/20/2018	Postage/Delivery	\$22.91	FedEx charge to Judge Orrick
12/21/2018	Postage/Delivery	\$7.00	Postage fee for sending doc production
12/26/2018	Postage/Delivery	\$22.91	FedEx charge to Judge Orrick
12/28/2018	Postage/Delivery	\$14.00	Mail docs to OC
1/3/2019	Postage/Delivery	\$18.05	Mail docs to OC
1/10/2019	Postage/Delivery	\$31.15	FedEx charge to client
3/26/2019	Postage/Delivery	\$1.15	USPS to OC
6/18/2019	Postage/Delivery	\$33.46	Printing discovery docs for service, UPS store San Jose
10/3/2019	Postage/Delivery	\$28.24	FedEx charge to Judge Orrick
10/22/2019	Postage/Delivery	\$58.48	FedEx charge to Judge Orrick
11/20/2019	Postage/Delivery	\$19.50	USPS sending courtesy copies of MSJ to Judge Orrick
1/14/2020	Postage/Delivery	\$14.35	USPS of courtesy copy of admin motion and motion for sanctions
11/3/2021	Postage/Delivery	\$16.25	USPS cost for sending chambers copy of Plaintiff's Bill of Costs
12/14/2022	Postage/Delivery	\$20.52	FedEx fee for check to court reporter Knox for transcript
2/9/2023	Postage/Delivery	\$33.88	FedEx of documents to client
4/6/2023	Postage/Delivery	\$19.30	USPS of witness fee checks to Jackson and Wheeler
11/21/2017	File/ Serve	\$215.00	Evan Allen servicesm CitiStaff, West Valley etc. inv 8473 (reduced)
8/1/2018	File/ Serve	\$230.00	Evan Allen to Baca, Zalom, Antonucci, Nickerson/Hayati
11/9/2018	Postage/Delivery	\$59.05	Gold Rush Express Delivery #2283632 West Valley, Citistaff PMK notices
11/9/2018	Postage/Delivery	\$40.00	Personal service of West Valley, Citistaff PMK with Godspeed invoice #280.110918
11/28/2018	Postage/Delivery	\$41.75	Godspeed invoice no. 358-895 to Constagny, Brooks, Smith, Prophet
12/9/2018	File/ Serve	\$70.00	EA invoice no. 8508, service of subpoena on Ramon Martinez (returned, not served)
12/22/2018	Postage/Delivery	\$43.82	2 courtesy copies to judge, 12/22 and 12/28
1/7/2019	File/ Serve	\$63.25	EA invoice no. 8511, service on Defendant nextSource, Inc.
9/18/2019	Postage/Delivery	\$43.90	East Bay Messengers Personal delivery of discovery requests
10/1/2019	Postage/Delivery	\$43.37	Gold Rush Express serve OC with NODs
10/1/2019	Postage/Delivery	\$60.70	East Bay Messengers NODs on OC



Date	Type	Total	Description
10/1/2019	Postage/Delivery	\$64.75	Specialized Legal Fisher Philips
10/1/2019	Postage/Delivery	\$64.75	Specialized Legal Sheppard Mullin
10/3/2019	Postage/Delivery	\$52.37	Gold Rush Express serve OC amended NODs
10/3/2019	Postage/Delivery	\$65.75	Specialized Legal invoice no. P175462, service on Sheppard Mullin
10/3/2019	Postage/Delivery	\$65.75	Specialized Legal invoice no. P175464, service on Fisher Phillips East Bay Messengers
10/4/2019	Postage/Delivery	\$40.60	amended NODs EA invoice no. 8566, skip trace and service of Erin Marconi. No service.
9/22/2021	File/ Serve	\$240.00	USPS courtesy copies of motion to retain confidentiality to orrick
12/10/2019	Postage/Delivery	\$21.75	
1/4/2023	Postage/Delivery	\$20.52	FedEx charge for check to MK Litigation Solutions
		<b>2099.78</b>	<b>TOTAL POSTAGE/DELIVERY EXPENSES</b>

Date	Type	Cost	Description
12/6/2018	Other	\$490.00	Investigation for Foster, Jackson, and Martinez
10/1/2018	Other	\$1,800.00	Jeffery Ross mediation
11/27/2018	Other	\$121.80	Order copies of subpoenaed records from AC transit, Alamillo Rebar, and Glazier Steel
			Ad Hoc Reporting invoice #19-25183
10/30/2019	Other	\$11.70	Hearing transcript for Citistaff MSJ hearing
1/3/2020	Other	\$63.75	Transcript for MSJ hearing on 12/17, Katherine Sullivan - court reporter
3/4/2020	Other	\$6,724.00	Reservation fee for 1/2 cost of focus group location organized by Harry Plotkin
			Stu Kohler investigation
			Jeff Henry
4/16/2020	Other	\$85.00	round 1 of investigation
8/25/2021	Other	\$10.00	Craigslist posting for focus group
9/7/2021	Other	\$1,200.25	Focus Group payments to participants \$50 each, 23 people. PayPal fees 50.25
12/18/2022	Other	\$40.00	Craigslist ads (4) for focus group ads
12/21/2022	Other	\$1,025.60	PayPal payments of \$100/each plus fees to 10 focus group participants
2/12/2023	Other	\$10.00	Focus Group ad for Feb. 16 focus group (North Bay Counties)
2/12/2023	Other	\$10.00	Focus Group ad for Feb. 16 focus group (SF County)
2/12/2023	Other	\$10.00	Focus Group ad for Feb. 16 focus group (East Bay Counties)
2/12/2023	Other	\$10.00	Focus Group ad for Feb. 16 focus group (San Mateo County)
2/16/2023	Other	\$697.32	PayPal payments of \$75/each plus fees to 9 focus group participants
2/27/2023	Other	\$697.32	PayPal payments of \$75 plus fees to 9 focus group participants
2/27/2023	Other	\$40.00	Craigslist ad fees (4) for focus group ads (March 2)
2/28/2023	Other	\$40.00	Craigslist ad fees (4) for focus group ads (March 4)
3/2/2023	Other	\$736.21	PayPal payments of \$75 to 9 focus group participants, \$37.50 to 1 participant; plus fees
3/4/2023	Other	\$774.80	PayPal payments of \$75 plus fees to 10 focus group participants
3/8/2023	Other	\$40.00	Craigslist fees for posting focus group ads (4 ads)
3/13/2023	Other	\$577.38	Payment of \$75/each, plus fees, to focus group participants
3/14/2023	Other	\$40.00	Craigslist ad fees (4) for focus group ads
3/18/2023	Other	\$40.00	Craigslist ad fees (4) for reposting focus group ads
3/18/2023	Other	\$928.80	Paypal payments of \$100/each, plus fees, to focus group participants
3/19/2023	Other	\$97.80	Amazon order of trial materials: numbered stickers
3/19/2023	Other	\$243.81	Amazon order of trial materials: binders and numbered tabs
3/19/2023	Other	\$55.24	Amazon order of trial materials: divider tabs
3/20/2023	Other	\$42.42	Amazon order of trial materials: binders
3/20/2023	Other	\$104.99	Amazon order of trial materials: numbered stickers and tabs
3/21/2023	Other	\$852.28	Payment of \$75/each, plus fees, to focus group participants
3/22/2023	Other	\$40.00	Craigslist fees for focus group ads (4)
3/22/2023	Other	\$55.20	Amazon order of trial materials: binders

Date	Type	Cost	Description
3/22/2023	Other	\$82.50	Amazon order of trial materials: numbered stickers
3/26/2023	Other	\$422.80	FedEx cost of printing demonstrative posters
3/27/2023	Other	\$30.69	Amazon order of trial materials: masks for use during trial
4/6/2023	Other	\$335.00	BMA invoice no. 9002802, reprint originals
		<b>\$18,586.66</b>	<b>TOTAL MISC. EXPENSES</b>

# Exhibit 5

# LAFFEY MATRIX

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			Years Out of Law School *				
Year	Adjustmt Factor**	Paralegal/ Law Clerk	1-3	4-7	8-10	11-19	20 +
6/01/23- 5/31/24	1.059295	\$239	\$437	\$538	\$777	\$878	\$1057
6/01/22- 5/31/23	1.085091	\$225	\$413	\$508	\$733	\$829	\$997
6/01/21- 5/31/22	1.006053	\$208	\$381	\$468	\$676	\$764	\$919
6/01/20- 5/31/21	1.015894	\$206	\$378	\$465	\$672	\$759	\$914
6/01/19- 5/31/20	1.0049	\$203	\$372	\$458	\$661	\$747	\$899
6/01/18- 5/31/19	1.0350	\$202	\$371	\$455	\$658	\$742	\$894
6/01/17- 5/31/18	1.0463	\$196	\$359	\$440	\$636	\$717	\$864
6/01/16- 5/31/17	1.0369	\$187	\$343	\$421	\$608	\$685	\$826
6/01/15- 5/31/16	1.0089	\$180	\$331	\$406	\$586	\$661	\$796
6/01/14- 5/31/15	1.0235	\$179	\$328	\$402	\$581	\$655	\$789
6/01/13- 5/31/14	1.0244	\$175	\$320	\$393	\$567	\$640	\$771
6/01/12- 5/31/13	1.0258	\$170	\$312	\$383	\$554	\$625	\$753
6/01/11- 5/31/12	1.0352	\$166	\$305	\$374	\$540	\$609	\$734
6/01/10- 5/31/11	1.0337	\$161	\$294	\$361	\$522	\$589	\$709
6/01/09- 5/31/10	1.0220	\$155	\$285	\$349	\$505	\$569	\$686
6/01/08- 5/31/09	1.0399	\$152	\$279	\$342	\$494	\$557	\$671
6/01/07-5/31/08	1.0516	\$146	\$268	\$329	\$475	\$536	\$645
6/01/06-5/31/07	1.0256	\$139	\$255	\$313	\$452	\$509	\$614
6/1/05-5/31/06	1.0427	\$136	\$249	\$305	\$441	\$497	\$598
6/1/04-5/31/05	1.0455	\$130	\$239	\$293	\$423	\$476	\$574
6/1/03-6/1/04	1.0507	\$124	\$228	\$280	\$405	\$456	\$549
6/1/02-5/31/03	1.0727	\$118	\$217	\$267	\$385	\$434	\$522
6/1/01-5/31/02	1.0407	\$110	\$203	\$249	\$359	\$404	\$487
6/1/00-5/31/01	1.0529	\$106	\$195	\$239	\$345	\$388	\$468
6/1/99-5/31/00	1.0491	\$101	\$185	\$227	\$328	\$369	\$444
6/1/98-5/31/99	1.0439	\$96	\$176	\$216	\$312	\$352	\$424
6/1/97-5/31/98	1.0419	\$92	\$169	\$207	\$299	\$337	\$406
6/1/96-5/31/97	1.0396	\$88	\$162	\$198	\$287	\$323	\$389
6/1/95-5/31/96	1.032	\$85	\$155	\$191	\$276	\$311	\$375

6/1/94-5/31/95	1.0237	\$82	\$151	\$185	\$267	\$301	\$363
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The methodology of calculation and benchmarking for this Updated Laffey Matrix has been approved in a number of cases. See, e.g., *DL v. District of Columbia*, 267 F.Supp.3d 55, 69 (D.D.C. 2017)

\*  $\frac{1}{2}$ Years Out of Law School  $\frac{1}{2}$  is calculated from June 1 of each year, when most law students graduate.  $\frac{1}{2}$ 1-3" includes an attorney in his 1st, 2nd and 3rd years of practice, measured from date of graduation (June 1).  $\frac{1}{2}$ 4-7" applies to attorneys in their 4th, 5th, 6th and 7th years of practice. An attorney who graduated in May 1996 would be in tier  $\frac{1}{2}$ 1-3" from June 1, 1996 until May 31, 1999, would move into tier  $\frac{1}{2}$ 4-7" on June 1, 1999, and tier  $\frac{1}{2}$ 8-10" on June 1, 2003.

\*\* The Adjustment Factor refers to the nation-wide Legal Services Component of the Consumer Price Index produced by the Bureau of Labor Statistics of the United States Department of Labor.

# Exhibit 6

Date	Type	Total	Description
9/21/2017	Travel Expense	\$28.00	Larry parking for meeting with Owen Diaz
5/15/2018	Appearance/Attend	\$36.00	deposition
5/15/2018	Travel Expense	\$27.24	Larry Organ travel and return to SF
5/15/2018	Travel Expense	\$26.30	Larry Organ lunch at Manhattan Hub
5/22/2018	Travel Expense	\$36.00	Diaz depo parking LAZ parking
5/22/2018	Travel Expense	\$27.24	GGB toll plus travel to SF
5/22/2018	Travel Expense	\$53.36	Larry Organ LA appearance, restaurant
6/11/2018	Travel Expense	\$36.00	Larry Organ parking at mediation (LAZ Parking)
6/11/2018	Travel Expense	\$34.00	Ramzi Nimr mediation parking
			Ramzi travel to mediation
6/11/2018	Travel Expense	\$20.28	13.1 miles and Bay Bridge
9/4/2018	Travel Expense	\$12.00	Center parking)
9/7/2018	Appearance/ Attend	\$30.00	CMC conference CourtCall
			mediation
10/16/2018	Travel Expense	\$74.68	(LO)
10/16/2018	Travel Expense	\$16.00	Navruz Avloni parking for mediation
12/3/2018	Travel Expense	\$36.00	Larry Organ parking during Owen Diaz
12/4/2018	Travel Expense	\$36.00	Navruz Avloni parking for Demetric Di-az depo
12/16/2018	Travel Expense	\$25.00	Navruz Avloni parking for Monica Deleon depo
			Mullin
6/7/2019	Travel Expense	\$35.00	Impark SF
			for Titus McCaleb deposition preparation
6/17/2019	Travel Expense	\$20.00	meeting
			Navruz Avloni parking with CSJ Smart Meters
6/18/2019	Travel Expense	\$3.75	during Titus McCaleb depo
6/18/2019	Travel Expense	\$37.86	Navruz Avloni lunch with McCaleb during depo
6/20/2019	Travel Expense	\$18.00	by Navruz Avloni)
6/20/2019	Travel Expense	\$14.00	deposition
6/21/2019	Travel Expense	\$24.00	Navruz Avloni parking during Demetrica depo
7/26/2019	Travel Expense	\$20.00	depo
7/29/2019	Travel Expense	\$36.75	Navruz Avloni lunch with Lamar during depo
9/9/2019	Travel Expense	\$35.00	Navruz Avloni parking during M&C with OC
			Sabrina Grislis travel to SF for personal service
9/13/2019	Travel Expense	\$24.21	(18.1 miles, 7.25 bridge toll, 6 parking)
9/13/2019	Travel Expense	\$24.00	Navruz Avloni parking M&C with OC
10/1/2019	Travel Expense	\$505.96	Client Owen Diaz flight to Burbank for expert
10/9/2019	Travel Expense	\$18.00	deposition
10/14/2019	Travel Expense	\$535.96	in Los Angeles
10/15/2019	Travel Expense	\$24.00	Martinez deposition
10/21/2019	Travel Expense	\$21.29	Marconi deposition
10/21/2019	Travel Expense	\$53.94	Marconi depo
10/21/2019	Travel Expense	\$17.39	Larry Organ meal at LAX for Marconi depo



Date	Type	Total	Description
10/21/2019	Travel Expense	\$38.00	Larry Organ airport parking at OAK to LAX
10/22/2019	Travel Expense	\$37.85	Marconi depo
10/22/2019	Travel Expense	\$7.57	Marconi depo
10/22/2019	Travel Expense	\$16.60	Larry Organ travel meal at airport
10/23/2019	Travel Expense	\$9.00	MSJ hearing
12/17/2019	Travel Expense	\$68.48	Cimone Nunley mileage to MSJ hearing
1/16/2020	Appearance/ Attend	\$20.00	Larry Organ Parking MSC
1/16/2020	Travel Expense	\$73.37	Cimone Nunley and Larry Organ Uber back to San Anselmo after MSC
3/10/2020	Travel Expense	\$66.50	Larry Organ parking for Amy Oppenheimer depo in SF on March 9 (had to move car)
3/18/2020	Appearance/ Attend	\$30.00	Larry Organ Court Call for 3.10 Call with Judge Orrick re possible new trial dates
9/14/2021	Travel Expense	\$2,291.75	during trial
9/24/2021	Travel Expense	\$120.00	Sabrina Grislis parking at UC Hastings garage for trial: 9/24, 27, 28, 29; 10/1, 4
9/24/2021	Travel Expense	\$140.00	Larry Organ parking at UC Hastings garage for trial (9/24, 27, 28, 29, 30; 10/1, 4)
9/24/2021	Travel Expense	\$99.00	30; 10/1, 4
3/6/2023	Travel Expense	\$1,328.25	trial
3/6/2023	Travel Expense	\$1,695.75	trial
3/22/2023	Travel Expense	\$118.02	Cameron Hartquist meal purchase: lunch for trial team during prep meeting
3/24/2023	Travel Expense	\$24.00	courthouse
3/26/2023	Travel Expense	\$57.60	Purchase of snacks during trial
3/27/2023	Travel Expense	\$185.94	Lunch for trial team day 1
3/28/2023	Travel Expense	\$177.86	Teodora Gagauz
3/29/2023	Travel Expense	\$143.13	Trial day 3, lunch for trial team
3/29/2023	Travel Expense	\$185.68	team, Sol Food
3/30/2023	Travel Expense	\$284.92	Trial day 4, lunch for trial team
3/31/2023	Travel Expense	\$110.00	for 3/27-31
4/3/2023	Travel Expense	\$98.00	Cimone Nunley parking costs at trial: \$22/day for 3/27, 3/28 3/31; \$32/day for 4/3
4/3/2023	Travel Expense	\$120.00	\$20/day
4/3/2023	Travel Expense	\$142.00	trial: \$22/day for 3/27, 28, 28, 31, 4/3. \$32/day for 3/30
4/18/2023	Travel Expense	\$131.32	travel related to trial: 37.3 miles RT and \$8.40 bridge toll/day for 4 days.
12/17/2019	Travel Expense	\$536.96	12.17.2019- JBA
12/17/2019	Travel Expense	\$266.67	Confirmation 22495755: MSJ
12/17/2019	Travel Expense	\$266.67	12.16.20- JBA
1/16/2020	Travel Expense	\$535.96	MSC 1.16.2020 - JBA

<b>Date</b>	<b>Type</b>	<b>Total</b>	<b>Description</b>
9/10/2021	Travel Expense	\$262.97	Southwest RSVP 4594OI- Trial- Adv. 9.10.21
9/30/2021	Travel Expense	\$54.99	(Advanced) 9.30.2021 - JBA
10/6/2021	Travel Expense	\$5,672.85	Adv. 10.6.21 - JBA
3/16/2023	Travel Expense	\$2,826.16	468357- Diaz Trial Pt. 2 - JBA
3/16/2023	Travel Expense	\$753.96	Southwest: 3XMVOJ- Diaz Trial Prep - JBA
3/16/2023	Travel Expense	\$2,084.78	Diaz Trial Prep - JBA
3/22/2023	Travel Expense	\$649.96	JBA
3/24/2023	Travel Expense	\$37.79	Uber- Driver, Hequn on 3/24/2023 - JBA
3/24/2023	Travel Expense	\$41.96	Uber, Plate-6KOU262- on 3/24/2023 - JBA
3/25/2023	Travel Expense	\$73.58	Uber- Plate-9EQY979 On 3/25/2023 - JBA
3/26/2023	Travel Expense	\$55.16	Uber- Plate- 9ESU951- on 3/26/2023 - JBA
3/28/2023	Travel Expense	\$12.98	Uber- Plate- 9BXJ716 on 3/28/2023 - JBA
3/29/2023	Travel Expense	\$71.35	Uber- Plate- 8LOZ314 on 3/29/2023 - JBA
3/30/2023	Travel Expense	\$78.18	Uber- Plate- 9EQA879 on 3/25/2023 - JBA
3/30/2023	Travel Expense	\$101.09	3/24/2023 - JBA
3/30/2023	Travel Expense	\$10.60	Uber- Plate- 8TIG199 on 3/30/2023 - JBA
3/31/2023	Travel Expense	\$13.60	Uber-Plate 8TIG199 on 3/30/2023 - JBA
4/2/2023	Travel Expense	\$692.96	Southwest: Confirmation 3DY7PL- JBA's flight for Diaz Trial (Advanced)
4/2/2023	Travel Expense	\$40.75	Uber- Driver "Unan" on 4/2/2023 - JBA
4/3/2023	Travel Expense	\$315.15	IHG: 66086180- 4/3/2023- 4/04/2023-- JBA
4/4/2023	Travel Expense	\$12.97	Uber- Plate - 7PPE197 on 3/29/2023 - JBA
4/4/2023	Travel Expense	\$76.87	Uber- Driver "Justin" on 4/3/2023 - JBA
10/6/2023	Travel Expense	\$120.00	Altshuler Berzon travel costs
		<b>\$25,244.05</b>	<b>TOTAL TRAVEL EXPENSES</b>

Date	Type	Total	Description
6/13/2018	Other	\$4,602.50	Dr. Bruce Smith (reduced by 50%)
6/19/2019	Other	\$6,000.00	Michael Robbins expert retainer EXTTI, Inc.
7/11/2019	Expert Witness	\$4,500.00	Michael Robbins invoice Invoice number 15912
10/1/2019	Expert Witness	\$10,000.00	Amy Oppenheimer Retainer for expert report (See Invoice 10472)
10/02/2019	Expert Witness	\$2,500.00	Dr. Anthony E. Reading Retainer (\$2,500)- Advanced
10/2/2019	Expert Witness	\$2,500.00	Dr Anthony Reading expert fee
10/21/2019	Expert Witness	\$5,438.00	Amy Oppenheimer expert witness fee remaining after retainer
10/31/2019	Expert Witness	\$5,392.50	Charles Mahla/Econ One, Invoice # 17568
11/2/2019	Expert Witness	\$905.00	Anthony Reading invoice, report preparation
11/30/2019	Expert Witness	\$3,548.55	Charles Mahla/Econ One, Invoice # 17710
2/29/2020	Expert Witness	\$5,575.60	Charles Mahla/Econ One, Invoice No. 18071
2/29/2020	Expert Witness	\$1,120.00	Charles Mahla/Econ One, Invoice no. 18071DEPO
3/10/2020	Expert Witness	\$675.00	Anthony Reading, PhD deposition preparation bill (even split with AMF, LLP)
3/10/2020	Expert Witness	\$3,000.00	Amy Oppenheimer invoice 10627
03/12/2020	Expert Witness	\$675	Dr. Anthony Reading Payment
3/13/2020	Expert Witness	\$4,548.00	Amy Oppenheimer Invoice 10639 for \$4548
04/09/2020	Expert Witness	\$1,125.00	Dr. Reading CHECK 8702 4.09.2020 (Advanced)
09/02/2020	Expert Witness	\$923.19	Expert, Anthony E. Readings, PhD 1.02.2020 (Advanced)
9/24/2021	Jury Consultant	\$13,640.54	Harry Plotkin jury consultant. All work up to trial 1
10/12/2021	Expert Witness	\$8,640.00	Amy Oppenheimer Invoice no. 1440, expert testimony/preparation in the Diaz trial.
10/12/2021	Expert Witness	\$4,307.50	Charles Mahla/Econ One, Invoice no. 20674, expert testimony and preparation in the Diaz trial
10/14/2021	Expert Witness	\$8,210.00	Dr. Anthony Reading Final Statement 10.14.21- Adv. 11.11.21
2/28/2023	Expert Witness	\$1,590.00	Charles Mahla/Econ One, invoice no. 23458, report prep
3/27/2023	Jury Consultant	\$15,490.39	Harry Plotkin jury consultant. All work up to trial 2
3/31/2023	Expert Witness	\$3,080.00	Charles Mahla/Econ One, invoice no. 23664, testimony and prep
3/31/2023	Expert Witness	\$9,480.00	Amy Oppenheimer, OIG trial 2 invoice
4/1/2023	Expert Witness	\$10,710.81	Dr Anthony Reading, trial 2 invoice
		<b>\$138,177.58</b>	<b>TOTAL EXPERT WITNESS EXPENSES</b>

Date	Type	Total	Description
4/30/2018	Postage/Delivery	\$63.95	Postal Service Plus
5/1/2018	Postage/Delivery	\$63.95	Postal Service Plus
5/18/2018	Postage/Delivery	\$16.00	USPS receipt
5/24/2018	Postage/Delivery	\$16.00	Postage to Los Angeles, San Jose
8/31/2018	Postage/Delivery	\$18.05	FedEx charge
10/12/2018	Postage/Delivery	\$13.60	CMRs to Los Angeles and Sacramento
12/20/2018	Postage/Delivery	\$22.91	FedEx charge to Judge Orrick
12/21/2018	Postage/Delivery	\$7.00	Postage fee for sending doc production
12/26/2018	Postage/Delivery	\$22.91	FedEx charge to Judge Orrick
12/28/2018	Postage/Delivery	\$14.00	Mail docs to OC
1/3/2019	Postage/Delivery	\$18.05	Mail docs to OC
1/10/2019	Postage/Delivery	\$31.15	FedEx charge to client
3/26/2019	Postage/Delivery	\$1.15	USPS to OC
6/18/2019	Postage/Delivery	\$33.46	Printing discovery docs for service, UPS store San Jose
10/3/2019	Postage/Delivery	\$28.24	FedEx charge to Judge Orrick
10/22/2019	Postage/Delivery	\$58.48	FedEx charge to Judge Orrick
11/20/2019	Postage/Delivery	\$19.50	USPS sending courtesy copies of MSJ to Judge Orrick
1/14/2020	Postage/Delivery	\$14.35	USPS of courtesy copy of admin motion and motion for sanctions
11/3/2021	Postage/Delivery	\$16.25	USPS cost for sending chambers copy of Plaintiff's Bill of Costs
12/14/2022	Postage/Delivery	\$20.52	FedEx fee for check to court reporter Knox for transcript
2/9/2023	Postage/Delivery	\$33.88	FedEx of documents to client
4/6/2023	Postage/Delivery	\$19.30	USPS of witness fee checks to Jackson and Wheeler
11/21/2017	File/ Serve	\$215.00	Evan Allen servicesm CitiStaff, West Valley etc. inv 8473 (reduced)
8/1/2018	File/ Serve	\$230.00	Evan Allen to Baca, Zalom, Antonucci, Nickerson/Hayati
11/9/2018	Postage/Delivery	\$59.05	Gold Rush Express Delivery #2283632 West Valley, Citistaff PMK notices
11/9/2018	Postage/Delivery	\$40.00	Personal service of West Valley, Citistaff PMK with Godspeed invoice #280.110918
11/28/2018	Postage/Delivery	\$41.75	Godspeed invoice no. 358-895 to Constagny, Brooks, Smith, Prophet
12/9/2018	File/ Serve	\$70.00	EA invoice no. 8508, service of subpoena on Ramon Martinez (returned, not served)
12/22/2018	Postage/Delivery	\$43.82	2 courtesy copies to judge, 12/22 and 12/28
1/7/2019	File/ Serve	\$63.25	EA invoice no. 8511, service on Defendant nextSource, Inc.
9/18/2019	Postage/Delivery	\$43.90	East Bay Messengers Personal delivery of discovery requests
10/1/2019	Postage/Delivery	\$43.37	Gold Rush Express serve OC with NODs
10/1/2019	Postage/Delivery	\$60.70	East Bay Messengers NODs on OC

Date	Type	Total	Description
10/1/2019	Postage/Delivery	\$64.75	Specialized Legal Fisher Philips
10/1/2019	Postage/Delivery	\$64.75	Specialized Legal Sheppard Mullin
10/3/2019	Postage/Delivery	\$52.37	Gold Rush Express serve OC amended NODs
10/3/2019	Postage/Delivery	\$65.75	Specialized Legal invoice no. P175462, service on Sheppard Mullin
10/3/2019	Postage/Delivery	\$65.75	Specialized Legal invoice no. P175464, service on Fisher Phillips East Bay Messengers
10/4/2019	Postage/Delivery	\$40.60	amended NODs EA invoice no. 8566, skip trace and service of Erin Marconi. No service.
9/22/2021	File/ Serve	\$240.00	USPS courtesy copies of motion to retain confidentiality to orrick
12/10/2019	Postage/Delivery	\$21.75	
1/4/2023	Postage/Delivery	\$20.52	FedEx charge for check to MK Litigation Solutions
10/6/2023	Postage/Delivery	\$0.57	Altshuler Berzon postage
		<b>\$2,100.35</b>	<b>TOTAL POSTAGE/DELIVERY EXPENSES</b>

Date	Type	Cost	Description
12/6/2018	Other	\$490.00	Investigation for Foster, Jackson, and Martinez
10/1/2018	Other	\$1,800.00	Jeffery Ross mediation
11/27/2018	Other	\$121.80	Order copies of subpoenaed records from AC transit, Alamillo Rebar, and Glazier Steel
			Ad Hoc Reporting invoice #19-25183
10/30/2019	Other	\$11.70	Hearing transcript for Citistaff MSJ hearing
1/3/2020	Other	\$63.75	Transcript for MSJ hearing on 12/17, Katherine Sullivan - court reporter
3/4/2020	Other	\$6,724.00	Reservation fee for 1/2 cost of focus group location organized by Harry Plotkin
			Stu Kohler investigation
			Jeff Henry
4/16/2020	Other	\$85.00	round 1 of investigation
8/25/2021	Other	\$10.00	Craigslist posting for focus group
9/7/2021	Other	\$1,200.25	Focus Group payments to participants \$50 each, 23 people. PayPal fees 50.25
12/18/2022	Other	\$40.00	Craigslist ads (4) for focus group ads
12/21/2022	Other	\$1,025.60	PayPal payments of \$100/each plus fees to 10 focus group participants
2/12/2023	Other	\$10.00	Focus Group ad for Feb. 16 focus group (North Bay Counties)
2/12/2023	Other	\$10.00	Focus Group ad for Feb. 16 focus group (SF County)
2/12/2023	Other	\$10.00	Focus Group ad for Feb. 16 focus group (East Bay Counties)
2/12/2023	Other	\$10.00	Focus Group ad for Feb. 16 focus group (San Mateo County)
2/16/2023	Other	\$697.32	PayPal payments of \$75/each plus fees to 9 focus group participants
2/27/2023	Other	\$697.32	PayPal payments of \$75 plus fees to 9 focus group participants
2/27/2023	Other	\$40.00	Craigslist ad fees (4) for focus group ads (March 2)
2/28/2023	Other	\$40.00	Craigslist ad fees (4) for focus group ads (March 4)
3/2/2023	Other	\$736.21	PayPal payments of \$75 to 9 focus group participants, \$37.50 to 1 participant; plus fees
3/4/2023	Other	\$774.80	PayPal payments of \$75 plus fees to 10 focus group participants
3/8/2023	Other	\$40.00	Craigslist fees for posting focus group ads (4 ads)
3/13/2023	Other	\$577.38	Payment of \$75/each, plus fees, to focus group participants
3/14/2023	Other	\$40.00	Craigslist ad fees (4) for focus group ads
3/18/2023	Other	\$40.00	Craigslist ad fees (4) for reposting focus group ads
3/18/2023	Other	\$928.80	Paypal payments of \$100/each, plus fees, to focus group participants
3/19/2023	Other	\$97.80	Amazon order of trial materials: numbered stickers
3/19/2023	Other	\$243.81	Amazon order of trial materials: binders and numbered tabs
3/19/2023	Other	\$55.24	Amazon order of trial materials: divider tabs
3/20/2023	Other	\$42.42	Amazon order of trial materials: binders
3/20/2023	Other	\$104.99	Amazon order of trial materials: numbered stickers and tabs
3/21/2023	Other	\$852.28	Payment of \$75/each, plus fees, to focus group participants
3/22/2023	Other	\$40.00	Craigslist fees for focus group ads (4)
3/22/2023	Other	\$55.20	Amazon order of trial materials: binders

Date	Type	Cost	Description
3/22/2023	Other	\$82.50	Amazon order of trial materials: numbered stickers
3/26/2023	Other	\$422.80	FedEx cost of printing demonstrative posters
3/27/2023	Other	\$30.69	Amazon order of trial materials: masks for use during trial
4/6/2023	Other	\$335.00	BMA invoice no. 9002802, reprint originals
10/6/2023	Other	\$389.00	Altshuler Berzon copy/printing costs
10/6/2023	Other	\$21.60	Altshuler Berzon court electronic records
10/6/2023	Other	\$2,612.35	Altshuler Berzon online legal research
10/6/2023	Other	\$13.65	Altshuler Berzon transcript
		<b>\$21,623.26</b>	<b>TOTAL MISC. EXPENSES</b>

Type	Total
Travel	\$25,244.05
Expert Witnesses	\$138,177.58
Postage, Delivery, Service	\$2,100.35
Other	\$21,623.26
<b>TOTAL EXPENSES:</b>	<b>\$187,145.24</b>



# Exhibit 7

**Law Offices of Amy Oppenheimer**

1442A Walnut St # 234

Berkeley, CA 94709

TAX ID: 94-3293346



Invoice submitted to:

**California Civil Rights Law Group**

332 San Anselmo Avenue

San Anselmo, CA 94960

**Invoice # 10472**

Invoice Date: 10/17/19

Terms: COD

Date	By	Service Summary	Hours/Qty	Rate	Amount
In Reference To: <b>Diaz v. Tesla (Professional Services)</b>					
09/27/19	A. Oppenheimer	Case intake	0.30	600.00	\$180.00
09/27/19	A. Oppenheimer	Review documents and distribute work	0.40	600.00	\$240.00
09/28/19	A. Oppenheimer	Review documents and distribute work	0.30	600.00	\$180.00
09/30/19	A. Donahue	Draft deposition summaries	0.80	120.00	\$96.00
09/30/19	E. Gifford	Draft deposition summaries	1.30	120.00	\$156.00
09/30/19	E. Gifford	Draft deposition summaries	0.60	120.00	\$72.00
09/30/19	E. Gifford	Draft deposition summaries	0.50	120.00	\$60.00
09/30/19	E. Gifford	Draft deposition summaries	0.40	120.00	\$48.00
09/30/19	E. Gifford	Draft deposition summaries	1.10	120.00	\$132.00
10/01/19	D. Marek	Draft deposition summaries	5.00	300.00	\$1,500.00
10/03/19	A. Donahue	Draft deposition summaries	6.00	120.00	\$720.00
10/03/19	D. Marek	Draft deposition summaries	3.50	300.00	\$1,050.00
10/03/19	E. Gifford	Draft deposition summaries	2.50	120.00	\$300.00
10/04/19	A. Donahue	Draft deposition summaries	2.00	120.00	\$240.00
10/04/19	A. Donahue	Draft deposition summaries	3.00	120.00	\$360.00
10/04/19	A. Donahue	Draft deposition summaries	0.50	120.00	\$60.00
10/04/19	E. Gifford	Draft deposition summaries	2.80	120.00	\$336.00
10/04/19	E. Gifford	Draft deposition summaries	2.50	120.00	\$300.00
10/04/19	E. Gifford	Draft deposition summaries	1.50	120.00	\$180.00
10/04/19	E. Gifford	Draft deposition summaries	1.90	120.00	\$228.00
10/04/19	J. Yassa	Draft deposition summaries	2.00	120.00	\$240.00
10/05/19	A. Donahue	Draft deposition summaries	1.50	120.00	\$180.00
10/05/19	E. Gifford	Draft deposition summaries	3.30	120.00	\$396.00
10/05/19	E. Gifford	Draft deposition summaries	1.80	120.00	\$216.00
10/05/19	E. Gifford	Draft deposition summaries	3.10	120.00	\$372.00
10/05/19	E. Gifford	Draft deposition summaries	2.30	120.00	\$276.00
10/08/19	J. Yassa	Draft deposition summaries	3.30	120.00	\$396.00
10/09/19	A. Oppenheimer	Review documents and summonses	2.20	600.00	\$1,320.00
10/09/19	J. Yassa	Draft deposition summaries	1.50	120.00	\$180.00
10/10/19	A. Oppenheimer	Review documents and summonses	5.60	600.00	\$3,360.00
10/10/19	A. Oppenheimer	Phone call	0.20	600.00	\$120.00
10/10/19	E. Gifford	Draft deposition summaries	3.20	120.00	\$384.00
10/11/19	A. Oppenheimer	Review materials; prepare report	2.60	600.00	\$1,560.00

Total due on receipt.

PLEASE MAKE CHECK PAYABLE TO: AMY OPPENHEIMER

Page: 1 of 2

Total Hours:	69.50
Total Labor:	15,438.00
<b>Total Invoice Amount:</b>	<b>\$15,438.00</b>
<b>Payments/Adjustments:</b>	<b>\$-10,000.00</b>
<b>Total Amount Due:</b>	<b>\$5,438.00</b>

**Payments/Adjustments**

Date	Transaction Type	Description	Amount	Applied here
10/17/19	Payment		-10,000.00	-10,000.00

**User Summary**

User	Hrs	Rate	Amount
A. Donahue	13.80	@ 120.00	1,656.00
A. Oppenheimer	11.60	@ 600.00	6,960.00
D. Marek	8.50	@ 300.00	2,550.00
E. Gifford	28.80	@ 120.00	3,456.00
J. Yassa	6.80	@ 120.00	816.00

Total due on receipt.

PLEASE MAKE CHECK PAYABLE TO: AMY OPPENHEIMER

**Law Offices of Amy Oppenheimer**

1442A Walnut St # 234

Berkeley, CA 94709

TAX ID: 94-3293346



Invoice submitted to:

**California Civil Rights Law Group**

332 San Anselmo Avenue

San Anselmo, CA 94960

**Invoice # 10627**

Invoice Date: 02/25/20

Terms: COD

Date	By	Service Summary	Hours/Qty	Rate	Amount
In Reference To: <b>Diaz v. Tesla (Professional Services)</b>					
02/10/20	A. Oppenheimer	Review documents & depo summaries; correspondence	1.80	600.00	\$1,080.00
02/23/20	A. Oppenheimer	Review documents & depo summaries; edit report	2.40	600.00	\$1,440.00
02/25/20	A. Oppenheimer	Phone call; edit report; collect documents	0.80	600.00	\$480.00

Total Hours: 5.00

Total Labor: 3,000.00

**Total Invoice Amount: \$3,000.00**

Previous Balance: \$5,800.00

Payments/Adjustments: \$-362.00

**Total Amount Due: \$8,438.00****Payments/Adjustments**

Date	Transaction Type	Description	Amount
10/17/19	Payment		-362.00

**User Summary**

User	Hrs	Rate	Amount
A. Oppenheimer	5.00	@ 600.00	3,000.00

Total due on receipt.

PLEASE MAKE CHECK PAYABLE TO: AMY OPPENHEIMER

Page: 1 of 1

**Law Offices of Amy Oppenheimer**

1442A Walnut St # 234

Berkeley, CA 94709

TAX ID: 94-3293346



Invoice submitted to:

**California Civil Rights Law Group**

332 San Anselmo Avenue

San Anselmo, CA 94960

**Invoice # 10639**

Invoice Date: 03/10/20

Terms: COD

Date	By	Service Summary	Hours/Qty	Rate	Amount
In Reference To: <b>Diaz v. Tesla (Professional Services)</b>					
11/06/19	J. Yassa	Draft deposition summary	0.70	120.00	\$84.00
11/11/19	J. Yassa	Draft deposition summaries	1.20	120.00	\$144.00
11/12/19	J. Yassa	Draft deposition summaries	1.60	120.00	\$192.00
02/11/20	J. Yassa	Deposition summary	0.80	120.00	\$96.00
02/13/20	J. Yassa	Deposition summary	0.30	120.00	\$36.00
02/15/20	J. Yassa	Deposition summary	0.80	120.00	\$96.00
02/16/20	J. Yassa	Deposition summary	2.00	120.00	\$240.00
03/07/20	A. Oppenheimer	Prepare for deposition	1.80	600.00	\$1,080.00
03/07/20	A. Oppenheimer	Case meeting	1.00	600.00	\$600.00
03/08/20	A. Oppenheimer	Prepare for deposition	1.30	600.00	\$780.00
03/09/20	A. Oppenheimer	Travel to/from deposition	2.00	600.00	\$1,200.00

Total Hours: 13.50

Total Labor: 4,548.00

**Total Invoice Amount: \$4,548.00**

Previous Balance: \$8,438.00

**Total Amount Due: \$12,986.00****User Summary**

User	Hrs	Rate	Amount
A. Oppenheimer	6.10	@ 600.00	3,660.00
J. Yassa	7.40	@ 120.00	888.00

Total due on receipt.

PLEASE MAKE CHECK PAYABLE TO: AMY OPPENHEIMER



# INVOICE

Invoice # 1440  
Date: 09/30/2021  
Due On: 11/29/2021

## Oppenheimer Investigations Group LLP

1442A Walnut Street, #234  
Berkeley, CA 94709  
www.oiglaw.com

California Civil Rights Law Group  
332 San Anselmo Avenue  
San Anselmo, CA 94960

### Diaz v. Tesla

Date	Attorney	Notes	Quantity	Rate	Total
09/13/2021	Amy Oppenheimer	Phone call; review document	1.20	\$600.00	\$720.00
09/21/2021	Amy Oppenheimer	Phone call; review correspondence	0.30	\$600.00	\$180.00
09/23/2021	Amy Oppenheimer	Prepare for trial	1.20	\$600.00	\$720.00
09/24/2021	Amy Oppenheimer	Preparation of trial testimony	3.50	\$600.00	\$2,100.00
09/25/2021	Amy Oppenheimer	Phone call with client	0.70	\$600.00	\$420.00
09/26/2021	Amy Oppenheimer	Preparation of PPT and trial testimony	1.50	\$600.00	\$900.00
09/29/2021	Amy Oppenheimer	File review, prepare PPT and opinions	3.40	\$600.00	\$2,040.00
09/30/2021	Amy Oppenheimer	Prepare to testify; testify	2.60	\$600.00	\$1,560.00

Time Keeper	Quantity	Rate	Total
Amy Oppenheimer	14.4	\$600.00	\$8,640.00
		<b>Subtotal</b>	<b>\$8,640.00</b>
		<b>Total</b>	<b>\$8,640.00</b>

We accept payment by check made payable to Oppenheimer Investigations Group LLP. We will accept payment by electronic transfer (ACH) upon your request. We do not require that payment be made via wire transfer and any communications stating otherwise should be brought to our attention immediately. Any questions can be directed to Cody Holtz, Office Manager (cody@oiglaw.com; (720) 445-1251).

Please pay within 60 days.



# INVOICE

Invoice # 4099  
Date: 03/31/2023  
Due On: 05/30/2023

## Oppenheimer Investigations Group LLP

1442A Walnut Street, #234  
Berkeley, CA 94709  
www.oiglaw.com

California Civil Rights Law Group  
332 San Anselmo Avenue  
San Anselmo, CA 94960

### Diaz v. Tesla

Date	Attorney	Notes	Quantity	Rate	Total
03/09/2023	Amy Oppenheimer	Phone call with D. Collier.	0.40	\$600.00	\$240.00
03/21/2023	Amy Oppenheimer	Review trial testimony and PowerPoints.	1.20	\$600.00	\$720.00
03/22/2023	Amy Oppenheimer	Phone call with D. Collier.	1.00	\$600.00	\$600.00
03/26/2023	Amy Oppenheimer	File review.	0.80	\$600.00	\$480.00
03/27/2023	Amy Oppenheimer	Phone call with D. Collier; file review and prep for testimony.	1.80	\$600.00	\$1,080.00
03/28/2023	Amy Oppenheimer	Travel to and testify in court.	7.00	\$600.00	\$4,200.00
03/29/2023	Amy Oppenheimer	Travel to and testify in court.	3.60	\$600.00	\$2,160.00

Time Keeper	Quantity	Rate	Total
Amy Oppenheimer	15.8	\$600.00	\$9,480.00
<b>Subtotal</b>			<b>\$9,480.00</b>
<b>Total</b>			<b>\$9,480.00</b>

We accept payment by check made payable to Oppenheimer Investigations Group LLP. We will accept payment by electronic transfer (ACH) upon your request. We do not require that payment be made via wire transfer and any communications stating otherwise should be brought to our attention immediately. Any questions can be directed to Cody Holtz, Office Manager (cody@oiglaw.com; (720) 445-1251).

Please pay within 60 days.

# Exhibit 8



**Anthony E Reading, PhD**  
**462 North Linden Drive**  
**Suite 445**  
**Beverly Hills, CA 90212**  
**(310)276-3545**

**Bill To:**

Larry Organ  
 CALIFORNIA CIVIL RIGHTS LAW GROUP  
 332 San Anselmo Avenue  
 San Anselmo, CA 94960

**Bill as of :** Nov 2, 2019

<b>Date</b>	<b>Transaction</b>	<b>Units</b>	<b>Charge</b>	<b>Total Owed</b>
	Previous Balance			\$0.00
10/2/2019	Legal Consult	3	\$1,350.00	\$1,350.00
10/2/2019	MMPI-2-RF	1	\$160.00	\$160.00
10/2/2019	PAI	1	\$160.00	\$160.00
10/2/2019	TSI-2	1	\$160.00	\$160.00
10/2/2019	Payment			(\$2,500.00)
10/4/2019	Preparation of Report	0.5	\$225.00	\$225.00
10/6/2019	Report Preparation	2.5	\$1,125.00	\$1,125.00
10/7/2019	Report Preparation	0.5	\$225.00	\$225.00
			<u>\$3,405.00</u>	<u>\$905.00</u>

**Please Pay this Amount:** \$905.00

Re: Owen Diaz

**Anthony E Reading, PhD**

**Anthony E Reading, PhD**  
**462 North Linden Drive**  
**Suite 445**  
**Beverly Hills, CA 90212**  
**(310)276-3545**

**Bill To:**

Larry Organ  
 CALIFORNIA CIVIL RIGHTS LAW GROUP  
 332 San Anselmo Avenue  
 San Anselmo, CA 94960

**Bill as of :** Jan 15, 2020

<b>Date</b>	<b>Transaction</b>	<b>Charge</b>	<b>Total Owed</b>
	Previous Balance		\$0.00
10/2/2019	Legal Consult	\$1,350.00	\$1,350.00
10/2/2019	MMPI-2-RF	\$160.00	\$160.00
10/2/2019	PAI	\$160.00	\$160.00
10/2/2019	TSI-2	\$160.00	\$160.00
10/2/2019	Payment		(\$2,500.00)
10/4/2019	Preparation of Report	\$225.00	\$225.00
10/6/2019	Report Preparation	\$1,125.00	\$1,125.00
10/7/2019	Report Preparation	\$225.00	\$225.00
12/1/2019	Interest		\$9.05
1/1/2020	Interest		\$9.14
		<hr/>	<hr/>
		\$3,405.00	\$923.19

**Please Pay this Amount:**

**\$923.19**

Re: Owen Diaz

**Anthony E Reading, PhD**

**Anthony E Reading, PhD  
462 North Linden Drive  
Suite 445  
Beverly Hills, CA 90212  
(310)276-3545**

**Bill To:**

Larry Organ  
CALIFORNIA CIVIL RIGHTS LAW GROUP  
332 San Anselmo Avenue  
San Anselmo, CA 94960

**Bill as of :** Mar 2, 2020

<b>Date</b>	<b>Transaction</b>	<b>Charge</b>	<b>Total Owed</b>
	Previous Balance		\$0.00
2/17/2020	Deposition Preparation	\$900.00	\$900.00
2/18/2020	Deposition Preparation	\$450.00	\$450.00
		<hr/>	<hr/>
		\$1,350.00	\$1,350.00

**Please Pay this Amount:**

**\$1,350.00**

Re: Owen Diaz

**Anthony E Reading, PhD**

**Anthony E Reading, PhD**  
**462 North Linden Drive**  
**Suite 445**  
**Beverly Hills, CA 90212**  
**(310)276-3545**

**Bill To:**

Larry Organ  
 CALIFORNIA CIVIL RIGHTS LAW GROUP  
 332 San Anselmo Avenue  
 San Anselmo, CA 94960

**Bill as of :** Oct 14, 2021

<b>Date</b>	<b>Transaction</b>	<b>Units</b>	<b>Charge</b>	<b>Total Owed</b>
	Previous Balance			\$0.00
10/2/2019	Legal Consult	3	\$1,350.00	\$1,350.00
10/2/2019	MMPI-2-RF	1	\$160.00	\$160.00
10/2/2019	PAI	1	\$160.00	\$160.00
10/2/2019	TSI-2	1	\$160.00	\$160.00
10/2/2019	Payment			(\$2,500.00)
10/4/2019	Preparation of Report	0.5	\$225.00	\$225.00
10/6/2019	Report Preparation	2.5	\$1,125.00	\$1,125.00
10/7/2019	Report Preparation	0.5	\$225.00	\$225.00
12/1/2019	Interest			\$9.05
1/1/2020	Interest			\$9.14
1/15/2020	Payment			(\$923.19)
2/17/2020	Deposition Preparation	2	\$900.00	\$900.00
2/18/2020	Deposition Preparation	1	\$450.00	\$450.00
3/3/2020	Deposition Review	1	\$450.00	\$450.00
3/12/2020	Payment			(\$675.00)
4/9/2020	Payment			(\$1,125.00)
9/11/2021	Court Preparation	4	\$1,800.00	\$1,800.00
9/12/2021	Court Preparation	2	\$900.00	\$900.00

**Anthony E Reading, PhD**

**Anthony E Reading, PhD  
462 North Linden Drive  
Suite 445  
Beverly Hills, CA 90212  
(310)276-3545**

**Bill To:**

Larry Organ  
CALIFORNIA CIVIL RIGHTS LAW GROUP  
332 San Anselmo Avenue  
San Anselmo, CA 94960

**Bill as of :** Oct 14, 2021

Date	Transaction	Units	Charge	Total Owed
9/30/2021	Court Preparation	3	\$1,350.00	\$1,350.00
9/30/2021	Court Testimony - Half Day	1	\$3,200.00	\$3,200.00
9/30/2021	Travel	4	\$340.00	\$340.00
9/30/2021	Airfare	0	\$320.00	\$320.00
10/7/2021	Hotel	0	\$300.00	\$300.00
			\$13,415.00	\$8,210.00

**Please Pay this Amount:**

**\$8,210.00**

Re: Owen Diaz

**Anthony E Reading, PhD**

**Anthony E Reading, PhD**  
**462 North Linden Drive**  
**Suite 445**  
**Beverly Hills, CA 90212**  
**(310)276-3545**

**Bill To:**

Larry Organ  
 CALIFORNIA CIVIL RIGHTS LAW GROUP  
 332 San Anselmo Avenue  
 San Anselmo, CA 94960

**Bill as of :** Apr 1, 2023

<b>Date</b>	<b>Transaction</b>	<b>Units</b>	<b>Charge</b>	<b>Total Owed</b>
	Previous Balance			\$0.00
3/26/2023	File Review	2	\$900.00	\$900.00
3/26/2023	Attorney Call	0.5	\$225.00	\$225.00
3/26/2023	Court Preparation	1	\$450.00	\$450.00
3/27/2023	Court Preparation	2	\$900.00	\$900.00
3/28/2023	Court Preparation	2	\$900.00	\$900.00
3/29/2023	Court Preparation	3	\$1,350.00	\$1,350.00
3/29/2023	Hotel	0	\$600.00	\$600.00
3/29/2023	Parking	0	\$100.00	\$100.00
3/29/2023	Taxi	0	\$70.00	\$70.00
3/29/2023	Airfare	0	\$475.81	\$475.81
3/30/2023	Court Testimony - Half Day	1	\$3,200.00	\$3,200.00
3/30/2023	Taxi	0	\$100.00	\$100.00
3/30/2023	Taxi	0	\$90.00	\$90.00
3/30/2023	Travel	3	\$1,350.00	\$1,350.00
			<u>\$10,710.81</u>	<u>\$10,710.81</u>

**Please Pay this Amount:**

**\$10,710.81**

**Anthony E Reading, PhD**

# Exhibit 9



## Open Balance Report as of 4/6/2020

In Re: Diaz et al. v. Tesla et al.

**To**  
Lawrence Organ, Esq.  
California Civil Rights Law Group  
332 San Anselmo Avenue  
San Anselmo, CA 94960

**Via Email**  
larry@civilrightsca.com

Original Invoice #	Invoice Date	Invoice Total	Paid To Date	Open Balance
17568	10/31/2019	\$ 5,392.50	\$ 0.00	\$ 5,392.50
17710	11/30/2019	3,548.55	0.00	3,548.55
18071	2/29/2020	5,575.60	0.00	5,575.60
18071DEPO	2/29/2020	1,120.00	0.00	1,120.00

**Total Open Balance** \$ **15,636.65**

# THIS IS NOT AN INVOICE

**Wire Payment to:**  
Pacific Western Bank  
ABA Routing # 122238200  
SWIFT Code: FNSDUS6D  
Account # 1001729969  
Beneficiary: Econ One Research

**Remit Check to:**  
Econ One Research  
550 South Hope Street, Suite 800  
Los Angeles, CA 90071  
Federal Taxpayer ID # 95-4639689



**INVOICE #****20674****IN RE:**

Page 1 of 2

**Diaz et al. v. Tesla et al.****Issue Date**

9/30/2021

**Billing Period**

9/1/2021 - 9/30/2021

**To**

Lawrence Organ, Esq.  
 California Civil Rights Law Group  
 332 San Anselmo Avenue  
 San Anselmo, CA 94960

**Via Email**

larry@civilrightsca.com

**Professional Services****Total**

Testimony/Deposition Preparation	\$	2,925.00
----------------------------------	----	----------

Research/Analysis		1,265.00
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Auditing		117.50
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Subtotal for Professional Services	\$	4,307.50
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<b>Total Due</b>	<b>\$</b>	<b>4,307.50</b>
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**TOTAL DUE UPON RECEIPT****PLEASE REMIT PAYMENT VIA WIRE OR ACH PER INSTRUCTIONS BELOW\*****Payment information:**

Pacific Western Bank  
 ABA Routing # 122238200  
 SWIFT Code: FNSDUS6D  
 Account # 1001729969  
 Beneficiary: Econ One Research

**If wire and ACH not possible, please remit check to:**

Econ One Research  
 550 South Hope Street, Suite 800  
 Los Angeles, CA 90071

Federal Taxpayer ID # 95-4639689

*\*When paying via Wire or ACH, please also email [receivables@econone.com](mailto:receivables@econone.com) indicating amount being transferred and the invoice(s) being paid.*

IN RE:

Diaz et al. v. Tesla et al.



Name	Title	Rate	Hours	Description
<b>Testimony/Deposition Preparation</b>				
Mahla, C.	Managing Director	\$ 560	1.0	Prepared demonstratives
Mahla, C.	Managing Director	560	3.0	Testimony preparation
Mahla, C.	Managing Director	560	0.3	Time at hearing/depo/trial/etc. for testimony
Abbott, B.	Consultant	235	0.5	Assisted testifier with preparation
Abbott, B.	Consultant	235	1.7	Prepared demonstratives
<b>Research/Analysis</b>				
Mahla, C.	Managing Director	560	1.0	Issue research/analysis
Abbott, B.	Consultant	235	3.0	Issue research/analysis
<b>Auditing</b>				
Ines, L.	Consultant	235	0.5	Audited analysis

**Econ One Research**

550 South Hope Street, Suite 800  
 Los Angeles, CA 90071  
 Federal Taxpayer ID # 95-4639689

Inv. # 20674  
 Page 2 of 2

**INVOICE #****23458****IN RE:**

Page 1 of 2

**Diaz et al. v. Tesla et al.****Issue Date**

2/28/2023

**Billing Period**

1/1/2023 - 2/28/2023

**Professional Services****Total**

Report Preparation

\$ 1,590.00

Subtotal for Professional Services \$ 1,590.00

**Total Due \$ 1,590.00****To**

Lawrence Organ, Esq.  
 California Civil Rights Law Group  
 332 San Anselmo Avenue  
 San Anselmo, CA 94960

**Via Email**

larry@civilrightsca.com

**TOTAL DUE UPON RECEIPT****PLEASE REMIT PAYMENT VIA WIRE OR ACH PER INSTRUCTIONS BELOW\*****Payment information:**

Pacific Western Bank  
 ABA Routing # 122238200  
 SWIFT Code: FNSDUS6D  
 Account # 1001729969  
 Beneficiary: Econ One Research

**If wire and ACH not possible, please remit check to:**

Econ One Research  
 550 South Hope Street, Suite 800  
 Los Angeles, CA 90071

Federal Taxpayer ID # 95-4639689

*\*When paying via Wire or ACH, please also email [receivables@econone.com](mailto:receivables@econone.com) indicating amount being transferred and the invoice(s) being paid.*

IN RE:

Diaz et al. v. Tesla et al.



Name	Title		Rate	Hours	Description
Report Preparation					
Mahla, C.	Managing Director	\$	560	2.0	Report preparation/drafting
Abbott, B.	Consultant		235	0.5	Report backup preparation
Abbott, B.	Consultant		235	1.5	Report preparation/drafting

**INVOICE #****23664****IN RE:**

Page 1 of 2

**Diaz et al. v. Tesla et al.****Issue Date**

3/31/2023

**Billing Period**

3/1/2023 - 3/31/2023

**To**

Lawrence Organ, Esq.  
 California Civil Rights Law Group  
 332 San Anselmo Avenue  
 San Anselmo, CA 94960

**Via Email**

larry@civilrightsca.com

**Professional Services****Total**

Testimony/Deposition Preparation

\$ 2,800.00

Client Service

280.00

Subtotal for Professional Services \$ 3,080.00

**Total Due \$ 3,080.00**

**TOTAL DUE UPON RECEIPT****PLEASE REMIT PAYMENT VIA WIRE OR ACH PER INSTRUCTIONS BELOW\*****Payment information:**

Pacific Western Bank  
 ABA Routing # 122238200  
 SWIFT Code: FNSDUS6D  
 Account # 1001729969  
 Beneficiary: Econ One Research

**If wire and ACH not possible, please remit check to:**

Econ One Research  
 550 South Hope Street, Suite 800  
 Los Angeles, CA 90071

Federal Taxpayer ID # 95-4639689

*\*When paying via Wire or ACH, please also email [receivables@econone.com](mailto:receivables@econone.com) indicating amount being transferred and the invoice(s) being paid.*

IN RE:

Diaz et al. v. Tesla et al.



Name	Title		Rate	Hours	Description
Testimony/Deposition Preparation					
Mahla, C.	Managing Director	\$	560	2.0	Testimony preparation
Mahla, C.	Managing Director		560	3.0	Time at hearing/depo/trial/etc. for testimony
Client Service					
Mahla, C.	Managing Director		560	0.5	Preparation for/meeting with client

# Exhibit 10

5055 Oakwood Avenue  
La Canada, CA 91011  
Los Angeles and Nationwide

# HARRY PLOTKIN

## JURY CONSULTANT

(626) 975-4457  
YourNextJury.com  
harry@yournextjury.com

**Invoice**  
PCA967SF

**Date**  
9/24/2021

**Case:** Diaz v. Tesla

---

**Billing Address:**

Lawrence A. Organ  
332 San Anselmo Avenue  
San Anselmo, CA 94960

**Invoice Summary:**

Invoice Number: PCA967SF  
Amount Due: **PAID IN FULL**  
Invoice Date: 9/24/2021

---

**Details:**

<i>Service Performed:</i>	<i>Date:</i>	<i>Hours:</i>	<i>Rate:</i>	<i>Amount:</i>
Reviewing case filings	1/31/2020	0.80	\$630	\$504.00
Phone call re: case issues	2/13/2020	1.08	\$630	\$682.50
Writing voir dire to submit to the court	3/3/2020	1.30	\$630	\$819.00
Phone call re: voir dire, questionnaire	3/13/2020	0.28	\$630	\$178.50
Writing jury questionnaire	3/17/2020	1.13	\$630	\$714.00
Revising jury questionnaire with new q's	3/23/2020	0.32	\$630	\$199.50
Reviewing defense JQ, revising JQ	3/27/2020	0.32	\$630	\$199.50
Developing trial themes/advice	4/10/2020	0.55	\$630	\$346.50
Phone call re: case themes	4/13/2020	0.47	\$630	\$294.00
Reviewing, ideas for demonstratives	4/17/2020	0.18	\$630	\$115.50
Phone call re: trial strategy	4/17/2020	2.05	\$630	\$1,291.50
Revising jury questionnaire	4/19/2020	0.18	\$630	\$115.50
Zoom meeting re: themes, demonstrative	6/17/2020	0.87	\$630	\$546.00
Zoom meeting re: themes, trial advice	8/19/2020	1.50	\$630	\$945.00
Writing new JQ questions	8/20/2020	0.48	\$630	\$304.50
Phone call re: jury selection procedures	9/21/2021	0.25	\$630	\$157.50
Reviewing juror questionnaires	9/22/2021	0.50	\$630	\$315.00
Reviewing juror research	9/23/2021	0.10	\$630	\$63.00
Phone call re: assessing jurors	9/23/2021	0.55	\$630	\$346.50
Writing focused voir dire	9/23/2021	0.27	\$630	\$168.00
Travel time to SF	9/23/2021	2.75	\$210	\$577.50
Selecting the jury	9/24/2021	5.00	\$630	\$3,150.00
Travel time from SF	9/24/2021	3.00	\$210	\$630.00

**Total Professional Fees**

**\$12,663.00**

**Expenses Incurred:**

<i>Date:</i>	<i>Amount:</i>
Airfare to/from SF	9/23/2021 \$618.00
Hotel in SF	9/24/2021 \$216.77
Lyfts in SF	9/24/2021 \$105.27
Airport parking	9/24/2021 \$37.50

**Total Expenses**

**\$977.54**

Subtotal Due

\$13,640.54

Payments to date

\$13,640.54

**Total Amount Due:**

**\$0.00**



5055 Oakwood Avenue  
La Canada, CA 91011  
Los Angeles and Nationwide

# HARRY PLOTKIN

## JURY CONSULTANT

(626) 975-4457  
YourNextJury.com  
harry@yournextjury.com

**Invoice**  
PCA967SF

**Date**  
12/12/2022

**Case:** Diaz v. Tesla

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**Billing Address:**

Lawrence A. Organ  
332 San Anselmo Avenue  
San Anselmo, CA 94960

**Invoice Summary:**

Invoice Number: PCA967SF  
Amount Due: **PAID IN FULL**  
Invoice Date: 12/12/2022

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**Details:**

<i>Service Performed:</i>	<i>Date:</i>	<i>Hours:</i>	<i>Rate:</i>	<i>Amount:</i>
Zoom re: trial themes/strategy	12/12/2022	1.50	\$750	\$1,125.00
Zoom re: focus groups	12/14/2022	0.70	\$750	\$525.00
Writing new voir dire questions	1/12/2023	0.52	\$750	\$387.50
Phone call re: themes, defenses	1/13/2023	0.35	\$750	\$262.50
Writing new voir dire questions	1/17/2023	0.32	\$750	\$237.50
Revising jury questionnaire	1/18/2023	0.42	\$750	\$312.50
Emailing re: Tesla voir dire, questionnaire	2/6/2023	0.37	\$750	\$275.00
Writing final voir dire questions	3/22/2023	0.55	\$750	\$412.50
Reviewing juror questionnaires	3/22/2023	1.57	\$750	\$1,175.00
Zoom re: questionnaires	3/22/2023	1.30	\$750	\$975.00
Emailing re: cause challenge arguments	3/23/2023	0.20	\$750	\$150.00
Phone calls/zooms re: hearing	3/24/2023	1.00	\$750	\$750.00
Zoom hearing re: cause challenges	3/24/2023	0.77	\$750	\$575.00
Travel time to San Francisco	3/26/2023	3.00	\$250	\$750.00
Reserving the day for jury selection	3/27/2023	7.50	\$750	\$5,625.00
Travel time back to Los Angeles	3/27/2023	3.00	\$250	\$750.00

**Total Professional Fees**

**\$14,287.50**

**Expenses Incurred:**

	<i>Date:</i>	<i>Amount:</i>
Airfare cancellation fee	3/23/2023	\$100.00
Airfare to/from SF	3/26/2023	\$598.00
Intercontinental Hotel in SF	3/26/2023	\$305.19
Lyfts in SF	3/26/2023	\$151.70
Airport parking	3/27/2023	\$48.00

**Total Expenses**

**\$1,202.89**

Subtotal Due

\$15,490.39

Payments to date

\$15,363.00

**Total Amount Due:**

**WAIVED**